

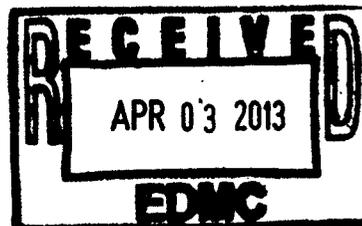


Department of Energy
 Richland Operations Office
 P.O. Box 550
 Richland, Washington 99352

13-AMRP-0130

MAR 22 2013

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:

PROPOSED CLASS 2 RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT MODIFICATIONS AT THE HANFORD FACILITY LIQUID EFFLUENT RETENTION FACILITY AND 200 AREA EFFLUENT TREATMENT FACILITY (LERF/ETF) AND THE INTEGRATED DISPOSAL FACILITY (IDF)

The U.S. Department of Energy Richland Operations Office (RL) as owner/operator and CH2M HILL Plateau Remediation Company as the co-operator (here after referred to as the Permittees) are proposing Class 2 modifications to addendums of the LERF/ETF and the IDF permits.

The Permittees are proposing a Class 2 modification to update calculated tank volumes and emergency pumping information in the LERF/ETF chapter of the Hanford Facility permit. These changes are only based on calculations, and have not resulted in any change in tank management practices at the facility. Changes throughout the text of permit attachment C were made to document the calculations and assumptions. The supporting document with the updated calculations has been placed in the facility operating record. The proposed Class 2 changes for the updated tank volume calculations falls under WAC 173-303-830 Appendix I G.1.b, "Modification or addition of tank units resulting in up to 25 percent increase in the facility's tank capacity."

The proposed changes at LERF/ETF to the emergency pumping information are to update for the current emergency pumping plans for the unit. Previously, the permit stated that portable pumps would be used at the LERF basins in an emergency pumping situation. When evaluating time frames for preparing and subsequent installation of portable pumps during an emergency as compared to using existing transfer pumps, the response time using the existing transfer pumps was determined to be superior (approximately 26.9 days total time for pumping using existing pumps versus 37.6 days of pumping using portable submersible pumps). The proposed changes to Addendum F will update to this new response plan. The proposed changes for this permit modification fall under WAC 173-303-830 Appendix I.H.4, "Modification of a surface impoundment management practice."

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The Permittees are also proposing a Class 2 modification to change the monitoring schedule of the IDF landfill. The IDF is a permitted, lined landfill located in the 200 East Area (in the center of the Hanford Site) that was constructed to accept mixed low-level and low-level waste landfill from Hanford cleanup activities. The IDF has not received any wastes to date, and is still in pre-active life monitoring. The proposed frequency for the remainder of the pre-active life is monitoring of the leak detection system on a quarterly schedule, and after major storm events. The changes to the monitoring of the liner fall under WAC 173-303-830 Appendix I.A.4.b, "Changes in the frequency of or procedures for monitoring, reporting, sampling, or maintenance activities by the Permittee."

Clean copies and redline-strikeout versions of proposed changes to affected permit sections are attached.

The notice required by the Permittees in WAC 173-303-830(4)(e)(ii)(C) will be included in the appropriate Hanford Federal Facility Agreement and Consent Order publication or list server, as described in Hanford Facility RCRA Permit Condition I.C.3.

If you have any questions, please contact me, or your staff may contact Jonathan Dowell, Assistant Manager for the River and Plateau, on (509) 373-9971.

Sincerely,

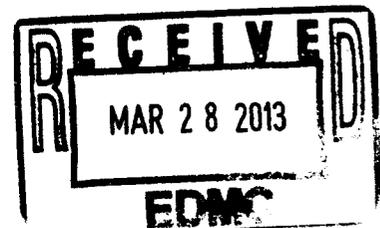


Matt McCormick
Manager

AMRP:MSC

Attachments

cc: See Page 3



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cc w/o attachs:

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D-2-11

S-2-8

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6.0 PROCEDURES TO PREVENT HAZARDS

This chapter discusses security, inspection schedules, preparedness and prevention requirements, preventive procedures, structures, equipment, and prevention of reaction of ignitable, reactive, and incompatible waste at the IDF. The requirements in this chapter that address activities involving the receipt and disposal of dangerous waste as defined in [WAC 173-303-040](#) shall be applied during the Active Life of the IDF. Active Life of a facility means the period from the initial receipt of dangerous waste at the facility until the department receives certification of final closure ([WAC 173-303-040](#)). The requirements of this chapter that do not apply to receipt and disposal of dangerous waste as defined in [WAC 173-303-040](#), shall be implemented by the Permittees during the Pre-Active Life of IDF. Pre-Active Life is not defined in the regulations, but refers to the facility maintenance period between final construction and the start of Active Life.

The IDF is designed and will be operated to minimize exposure of the general public and operating personnel to disposed waste. Shielding, contamination control, control of toxic or dangerous material, and safety and security procedures will be used to keep exposure as low as reasonably achievable (ALARA).

6.1 SECURITY

The following sections describe the security measures, equipment, and warning signs to be used to control entry to the IDF. A discussion of Hanford Facility security is provided in Attachment 33, Section 6.1.

6.1.1 Security Procedures and Equipment

The following sections describe the 24-hour surveillance system, barrier, and warning signs to be used to provide security and control access to the IDF.

6.1.1.1 24-Hour Surveillance System

The Hanford Facility is a controlled-access area [refer to Attachment 33, Section 6.1].

6.1.1.2 Barrier and Means to Control Entry

Because the IDF is located within the portion of the Hanford Facility controlled by the 24-hour surveillance system, [WAC 173-303-310](#)(2)(c) does not apply.

6.1.1.3 Warning Signs

Signs will be visible from all angles of approach, and legible from a distance of at least 7.6 meters. Each active area used for disposal will be posted with a sign, in English, reading, *DANGER-UNAUTHORIZED PERSONNEL KEEP OUT* or an equivalent legend.

6.1.2 Waiver

A waiver of the security procedures and equipment requirements for the IDF was not requested. Therefore, the requirements of [WAC 173-303-310](#)(1)(a) and (b) are not applicable.

1 **6.2 INSPECTION PLAN**

2 This section describes the method and schedule for inspections of the IDF. These inspections help to
3 ensure that situations do not exist that might cause or lead to the release of waste to the environment,
4 degradation of safety equipment and/or systems, or that might pose a threat to human health. Abnormal
5 conditions identified by inspections must be corrected.

6 **6.2.1 General Inspection Requirements**

7 The content and frequency of inspections are described in this section. Inspection discrepancies are
8 documented on inspection checklists and log sheets. The schedule and inspection records will be kept in
9 the inspection logbooks and retained by the IDF operations personnel. Inspection records will be retained
10 in accordance with Permit Condition II.I.1 and contain the following information:

- 11 • Date and time of inspection
- 12 • Printed name and the hand written signature of the inspector
- 13 • Notation of the observations made
- 14 • An account of spills or discharges in accordance with [WAC 173-303-145](#)
- 15 • Date and nature of any repairs or remedial actions taken.

16 The inspection checklists consist of a listing of items that are assessed during each inspection. A yes/no
17 response will be made for each listed item. A 'yes' response means that the item is in compliance with the
18 conditions stated on the checklist. Any problems identified during the inspection, as indicated by a 'no'
19 response on the checklist, will be reported immediately to the IDF operations supervisor.

20 **6.2.1.1 Types of Problems**

21 Types of problems looked for during an inspection in Pre-Active Life are in Table 6.2. Types of
22 problems looked for during an inspection in Active Life are in Table 6.3. Once the IDF begins to receive
23 dangerous waste, the requirements in Table 6.2 are no longer applicable. Each day mixed waste
24 containers and/or bulk waste are handled within the IDF; an operator will perform a daily inspection of
25 areas subject to spills (e.g., loading and unloading areas and waste handling areas).

26 **6.2.1.2 Frequency of Inspections**

27 Table 6.2 provides inspection frequencies during the Pre-Active Life. Tables 6.1, 6.2, and 6.3 provide
28 inspection frequencies during the Active Life. For clarification, areas with operations that may result in
29 spills are described below

30 Each step in the waste placement operation occurs in the landfill over the double HDPE liner system that
31 provides containment of any spill from the waste handling operation.

32 Waste Handling Operations involve the following:

- 33 • Unloading of the waste shipment in the landfill Placement of the cover soil over the waste container

34 During Active Life leachate,¹ movement occurs within the double-contained leachate handling
35 system. There is a potential for a leachate spill on the concrete containment slab of the Crest Pad
36 Building, Leachate Transfer Building, and/or the Leachate Loading Truck Pad.

¹ WAC 173-303-040 defines "Leachate" as any liquid, including any components suspended in the liquid that has percolated through or drained from dangerous waste.

1 Leachate Handling Operations involve the following:

- 2 • Pumping leachate from the collection sumps to the Crest Pad Building
- 3 • Activities within the Crest Pad Building
- 4 • Transfer of leachate to and from the double-lined Leachate Tanks
- 5 • All activities that occur in the Leachate Transfer Building
- 6 • Pumping of leachate to a tanker truck on the Truck Loading Pad

7 Liquid handling operations involve the following:

- 8 • The Secondary Leak Detection System (SLDS) is similar to the LDS, except that it is equipped with
9 liquid level indication instrumentation only. A low-capacity submersible pump can be inserted into
10 the SLDS sump if required. Pumping of liquid from the collection sump to the small, portable
11 container on the SLDS Pad may be required. Collected liquid in the SLDS that may be construction
12 water and/or liquid from other sources.

13 (Note that the secondary leak detection system is not a design requirement of [WAC 173-303-665](#),
14 however DOE has added the design feature pursuant to its authority under the Atomic Energy Act of 1954
15 (AEA) and not for the purposes of compliance with the dangerous waste regulations. Therefore,
16 information regarding the design, construction, and operation of the SLDS is provided for information
17 only. Pursuant to AEA, DOE has sole and exclusive responsibility and authority to regulate the source,
18 special nuclear and by-product material component of radioactive mixed waste at DOE-owned nuclear
19 facilities. Source, special nuclear and by-product materials, as defined by AEA, are not subject to
20 regulation under RCRA or the Hazardous Waste Management Act, by the State of Washington and are
21 not be subject to State dangerous waste permit, orders, or any other enforceable instrument issued there
22 under. DOE recognizes that radionuclide data may be useful in the development and confirmation of
23 geohydrologic conceptual models. Radionuclide data contained herein is therefore provided as a matter
24 of comity so the information may be used for such purposes).

25 **6.2.2 Schedule for Remedial Action for Problems Revealed**

26 The operating organization will remedy any problems revealed by the inspection on a schedule that
27 prevents hazards to human health and the environment. Where a hazard is imminent or already has
28 occurred immediate action will be taken. Immediate actions will be implemented based on ALARA
29 considerations, availability of supplies, equipment, and personnel.

30 **6.2.3 Specific Process or Waste Type Inspection Requirements**

31 The following sections detail the inspections to be performed at the IDF.

32 **6.2.3.1 Container Inspection**

33 On receipt, operations personnel will confirm appropriate documentation by inspecting each mixed
34 wasted container for disposal and compliance with the container receipt inspection criteria (Chapter 3.0)
35 before the mixed waste is placed in the IDF.

36 If present, off-specification waste and vitrified waste requiring cooling in storage will be subject to the
37 specific items and/or problems noted during weekly container inspection (Table 6.1) include the
38 following:

- 39 • Condition of trench floor and sides
- 40 • Container structural integrity
- 41 • Containers closed
- 42 • At a minimum, 76.2 centimeters aisle spacing

- 1 • Corrosion of containers
- 2 • Evidence of spills or leaks
- 3 • Container labels and markings in place, legible, and unobscured
- 4 • Areas in and around stored waste are free of combustibles (e.g., tumbleweeds)
- 5 • Waste separations such as tape, rope, chain or other cordon mechanism are intact.

6 If present, transport vehicles containing off specification waste or vitrified waste requiring cooling will be
7 subject to the specific items and/or problems noted during weekly inspection include the following:

- 8 • Transport vehicle structural integrity
- 9 • At a minimum, 76.2 centimeters aisle spacing between transporters
- 10 • Evidence of spills or leaks
- 11 • Areas in and around transport vehicles are free of combustibles (e.g. tumbleweeds)
- 12 • Separations such as tape, rope, chain or other cordon mechanism are intact.

13 Transport vehicles will not be subject to an individual container inspection within the transporter.
14 Records of inspection will be maintained as detailed in Section 6.2.1.

15 **6.2.3.2 Landfill Inspection**

16 The IDF will be inspected according to the frequencies in Table 6.2 during Pre-Active Life and in
17 accordance with Table 6.3 during Active Life.

18 **6.2.3.2.1 Run-on and Runoff Control System**

19 A run-on control system is installed around the perimeter of each lined trench (Chapter 4.0). The system
20 consists of a berm along the outer margin of each trench that prevents run-on from entering the trench.
21 All run-on control system berms are inspected quarterly (Table 6.2) and after storms for signs of
22 deterioration, malfunction, or improper operation. During Active Life, any precipitation that falls
23 between the run-on control berm and the edge of the trench excavation eventually might flow into the
24 primary leachate control and removal system sump and will be treated as leachate.

25 **6.2.3.2.2 Leak Detection System**

26 During pre-active life, the leak detection system will be monitored quarterly and after storms (Table 6.2)
27 for the amount of liquid removed. To calculate the action leakage rate, measurements are needed to be
28 collected over five consecutive days each quarter. The action leakage rate will be determined for the
29 quarter using these measurements collected during one five day work week each quarter.

30 During Active life (Table 6.3), leak detection for lined trench at the IDF is accomplished by the
31 following:

- 32 • Monitoring liquid level above the secondary liner
- 33 • Monitoring liquid levels above primary liner
- 34 • Inspecting for the presence of liquids after significant precipitation events
- 35 • Verifying certain gauges and instruments are in current calibration; calibration is performed annually
36 or more frequently at intervals suggested by the manufacturer (Chapter 4.0, Section 4.3.7.4)
- 37 • Recording secondary sump levels on a daily action leakage rate calculation sheet (Figure 6.1).

38 If the action leakage rate (Chapter 4.0, Appendix 4C) has not been exceeded, the liner system will be
39 functioning properly.

1 **6.2.3.2.3 Wind Dispersal Control System**

2 During pre-active life, berms will be inspected quarterly and after storms to ensure the berms are
3 functioning properly (Table 6.2).

4 During active life (Table 6.3), waste is inspected on receipt for evidence of damage, corrosion, or
5 deterioration that might lead to dispersal of the contents.

6 Unpackaged or bulk waste with any potential for wind dispersal is covered or sprayed with fixative after
7 being placed in a trench.

8 In addition, unpackaged or bulk waste handling operations are suspended in winds exceeding
9 24 kilometers per hour unless specifically approved by operations supervisors. The supervisor only
10 would grant approval to operate in winds over 24 kilometers per hour after determining that the risk to
11 human health or the environment would be diminished by completing the work activity, or that the nature
12 and form of the waste handling activity was such that the wind speed would have no significant impact.

13 **6.2.3.2.4 Leachate Collection and Removal System**

14 During pre-active life, the Leachate Collection and Removal System is inspected quarterly and after
15 storms (Table 6.2) for the presence of liquids, and that the system is functioning properly.

16 During active-life (Table 6.3), Liquids in the Leachate Collection and Removal System and Leak
17 Detection System are monitored daily to ensure the action leakage rate (Chapter 4.0, Appendix 4A) is not
18 exceeded and will be inspected per Table 6.2. In addition, a flow meter is used to check if the amount of
19 actual leachate pumped corresponds to the amount accumulated in the leachate collection tank. This
20 check will verify the proper function of the leachate collection and removal sump pumps with each use.

21 .

22 **6.3 PREPAREDNESS AND PREVENTION REQUIREMENTS**

23 Section 6.3.1 describes the preparedness and prevention measures to be implemented during Pre-Active
24 Life. Sections 6.3.2 through 6.3.7 describe the preparedness and prevention measures taken at the IDF
25 during Active Life.

26 **6.3.1 Pre-Active Life Preparedness and Prevention**

27 During Pre-Active Life, the Permittees will comply with Permit Attachment 4, Hanford Emergency
28 Management Plan (DOE/RL-94-02) as applicable for a facility that does not contain dangerous waste. An
29 emergency coordinator will be assigned to IDF who will manage and control all aspects of the initial
30 facility response when an emergency occurs.

31 **6.3.2 Equipment Requirements**

32 The following sections describe the internal and external communications systems and the emergency
33 equipment required.

34 **6.3.3 Internal Communication**

35 There is one building, MO-518, equipped to support communications. Immediate emergency instruction
36 to personnel working at the IDF will be provided by cellular telephones.

37 **6.3.4 External Communications**

38 Personnel at the IDF will have voice communication or equivalent (e.g., hand signals) during work
39 assignments to maintain external communications with shift supervisors. Supervision will contact the
40 Hanford Facility emergency telephone number (911) (373-3800 for cellular telephones) if assistance is
41 needed in the field.

1 **6.3.5 Emergency Equipment**

2 Emergency equipment will be available for use at the IDF. A list of equipment is included in the
3 contingency plan (Addendum J.1, Pre-Active Life, and Addendum J.2, Active Life).

4 The Hanford Facility relies primarily on the Hanford Fire Department to control fires. Emergency
5 equipment will not be located at IDF trenches. Portable fire extinguishers will be carried on IDF
6 operations vehicles. Attachment 4, *Hanford Emergency Management Plan*, (DOE/RL-94-02) identifies
7 the trained firefighting and emergency medical personnel and equipment.

8 **6.3.6 Water for Fire Control**

- 9 • Hanford Fire Department trucks as described in Permit Attachment 4, *Hanford Emergency*
10 *Management Plan*, (DOE/RL-94-02); and fire hydrants described in Addendum J.1 and
11 Addendum J.2 supply water for fire control at the IDF.

12 **6.3.7 Aisle Spacing Requirements for Off-Specification Waste**

13 Aisle spacing during off-specification and cooling vitrified waste storage operations is sufficient to allow
14 the movement of personnel and fire protection equipment in and around the containers. This aisle spacing
15 meets the requirements of [WAC 173-303-340](#)(3). Inspection aisle space must be at least 76.2 centimeters.
16 During off-specification storage operations, rows of containers are placed no more than two containers
17 wide in accordance with [WAC 173-303-630](#)(5)(c). Aisle spacing requirements will be applied to
18 transport vehicles but not to the waste within the transport vehicles.

19 **6.4 PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT**

20 The following sections will apply during the Active Life for the IDF and describe preventive procedures,
21 structures, and equipment.

22 **6.4.1 Unloading Operations**

23 Methods used to prevent release of waste during unloading operations will be employed as follows.

- 24 • Waste will be inspected according to the receipt inspection criteria (Chapter 3.0).
25 – If waste fails the inspection, it will be designated as an off-specification waste and could be
26 placed in the storage area or returned to the generator.
- 27 • Containers and bulk waste will be handled by appropriate equipment (i.e., crane) during unloading.
28 • Path from loading area to trench area will be clear of obstructions.

29 Spills will be managed as identified in the contingency plan (Addendum J.2).

30 Containers and bulk waste will be staged at the waste unloading area no longer than necessary for
31 placement into the landfill. Administrative procedures may prevent immediate unloading and backfilling
32 of waste containers. Containers might be left in the transporters as needed to resolve the administrative
33 procedure requirements or to support the operational schedule before containers are placed into the
34 landfill. The transfer vehicle containing vitrified waste requiring cooling may be temporarily placed in
35 the storage area prior to unloading for disposal.

36 **6.4.2 Runoff**

37 The waste in the IDF will be placed below the land surface; thus, the IDF is designed to prevent run-off of
38 precipitation that might have come in contact with the waste. The land surface is relatively level, so
39 trenches have only internal drainage. The minimal amounts of precipitation that accumulate are
40 contained within the trench.

1 The IDF trench is designed to channel run-on liquid away from the trench. Precipitation that percolates to
2 the bottom of the trench is captured in the leachate collection system and is managed as rainwater during
3 Pre Active Life. During Active Life, these liquids will be managed as multi-source leachate waste.

4 **6.4.3 Water Supplies**

5 The design and operation of the IDF during Active Life is intended to minimize the generation of
6 potentially contaminated leachate and to prevent leachate migration into groundwater resources in the
7 local area. All activities performed during Active Life (Chapter 4.0) or Pre-active Life is designed to
8 protect local water supplies.

9 Activities that prevent contamination of water supplies or groundwater will include the following:

- 10 • Placement of waste in lined trenches
 - 11 – Run-on and run-off will be controlled
 - 12 – Leak detection systems will be used
 - 13 – Leachate will be collected and managed as waste
 - 14 – Inspections will be performed
- 15 • Placement of backfill will occur after a layer of waste has been placed in the trench.

16 **6.4.4 Equipment and Power Failure**

17 Electrical power is required for the landfill. Electricity supplies power to the sump pumps used to remove
18 accumulated leachate from the primary and secondary liners. Electricity outages will be restored as soon
19 as possible. Backup equipment will be acquired if necessary to provide electrical service. Failed
20 equipment will be repaired or replaced as soon as possible.

21 **6.4.5 Personal Protection Equipment**

22 Personnel will be trained in the use of applicable personal protection equipment. The protective clothing
23 required for Active Life will vary depending on the form and content of the waste.

24 **6.5 PREVENTION OF REACTION OF IGNITABLE, REACTIVE, AND INCOMPATIBLE** 25 **WASTE**

26 The waste acceptance criteria will prohibit the disposal of ignitable, reactive, and incompatible waste at
27 the IDF. Waste acceptance criteria (Chapter 3.0) will ensure that the required treatment has been
28 performed before the waste is disposed in the IDF.

29 Waste stream compatibility (i.e., compatibility between individual waste streams and compatibility
30 between waste streams and landfill design and construction parameters) will be assessed on a case-by-
31 case basis. Criteria for assessing and determining compatibility will be identified in either the facility
32 Waste Acceptance Criteria, Waste Analysis Plan, or other protocol or procedure as appropriate
33 (Chapter 3.0) for further discussion of waste stream compatibility.

34

1 Table 6.1. Container Storage Inspections

| Requirement Description | Inspection Frequency | Types Of Problems |
|---|----------------------|--|
| -630(6) Containers | Weekly | Leaking Containers Deteriorating containers |
| -630(6) Containment System | Weekly | Deteriorating containment system |
| -395(1)(d) Ignitable or reactive waste | Not Applicable | Not Applicable |

2 Table 6.2. Landfill Inspections during Pre-Active Life***

| Requirement Description | Inspection Frequency | Types Of Problems |
|--|--|---|
| -665(4)(b)(i) Run-on and run-off control | Quarterly and after storms* | Deterioration, malfunction, or improper operation |
| -665(4)(b)(ii) Wind dispersal control systems | Quarterly and after storms* | Proper functioning |
| -665(4)(b)(iii) Leachate collection and removal systems | Quarterly and after storms* | Presence of liquids; proper functioning |
| -665(4)(c)(i) Leak detection system sump | Quarterly and after storms* | Amount of liquids removed |
| Secondary leak detection system sump** | Quarterly ** | Presence of unexpected liquid volume** |
| Security "Danger unauthorized personnel keep out" signs | Quarterly | Signs are posted and legible |
| Areas subject to spills | Daily when any activities may take place that have a potential for a spill or release to occur | Evidence of spills |

3 *A storm is any atmospheric disturbance with either wind gust of 56.3 kilometers per hour (35 miles per hour) or greater, or
4 precipitation of 0.5 inch or greater within a 24-hour period.

5 **Note: Secondary leak detection system is not a design requirement of [WAC 173-303-665](#), however DOE is adding the design
6 feature pursuant to its authority under the Atomic Energy Act of 1954 (AEA) and not for the purposes of compliance with
7 the dangerous waste regulations. Therefore, formation regarding the design, construction, and operation of the secondary
8 leak detection system is provided for information only. Pursuant to AEA, DOE has sole and exclusive responsibility and
9 authority to regulate the source, special nuclear and by-product material component of radioactive mixed waste at DOE-
10 owned nuclear facilities. Source, special nuclear and by-product materials, as defined by AEA, are not subject to regulation
11 under RCRA or the Hazardous Waste Management Act, by the State of Washington and are not be subject to State
12 dangerous waste permit, orders, or any other enforceable instrument issued there under. DOE recognizes that radionuclide
13 data may be useful in the development and confirmation of geohydrologic conceptual models. Radionuclide data contained
14 herein is therefore provided as a matter of comity so the information may be used for such purposes.

15
16 *** Once the IDF begins to receive dangerous waste, the requirements in Table 6.2 are no longer applicable, and inspection
17 requirements will be as provided in Table 6.3

18

Table 6.3. Landfill Inspections during Active Life

| Requirement Description | Inspection Frequency | Types Of Problems |
|---|--|---|
| -665(4)(b)(i) Run-on and run-off control | Weekly and after storms* | Deterioration, malfunction, or improper operation |
| -665(4)(b)(ii) Wind dispersal control systems | Weekly and after storms* | Proper functioning |
| -665(4)(b)(iii) Leachate collection and removal systems | Weekly and after storms* | Presence of leachate; proper functioning |
| -665(4)(c)(i) Leak detection system sump | Weekly and after storms* | Amount of liquids removed |
| Secondary leak detection system sump** | Monthly** | Presence of unexpected liquid volume** |
| Security devices: "Danger unauthorized personnel keep out" signs | Weekly | Signs are posted and legible |
| Areas subject to spills | Daily when waste management activities having a potential for a spill to occur | Evidence of spills |

*A storm is any atmospheric disturbance with either wind gust of 56.3 kilometers per hour (35 miles per hour) or greater, or precipitation of 0.5 inch or greater within a 24-hour period.

**Note: Secondary leak detection system is not a design requirement of [WAC 173-303-665](#), however DOE is adding the design feature pursuant to its authority under the Atomic Energy Act of 1954 (AEA) and not for the purposes of compliance with the dangerous waste regulations. Therefore, formation regarding the design, construction, and operation of the secondary leak detection system is provided for information only. Pursuant to AEA, DOE has sole and exclusive responsibility and authority to regulate the source, special nuclear and by-product material component of radioactive mixed waste at DOE-owned nuclear facilities. Source, special nuclear and by-product materials, as defined by AEA, are not subject to regulation under RCRA or the Hazardous Waste Management Act, by the State of Washington and are not be subject to State dangerous waste permit, orders, or any other enforceable instrument issued there under. DOE recognizes that radionuclide data may be useful in the development and confirmation of geohydrologic conceptual models. Radionuclide data contained herein is therefore provided as a matter of comity so the information may be used for such purposes.

1 **Chapter 6.0** **Procedures to Prevent Hazards**

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8

6.0 PROCEDURES TO PREVENT HAZARDS

This chapter discusses security, inspection schedules, preparedness and prevention requirements, preventive procedures, structures, equipment, and prevention of reaction of ignitable, reactive, and incompatible waste at the IDF. The requirements in this chapter that address activities involving the receipt and disposal of dangerous waste as defined in [WAC 173-303-040](#) shall be applied during the Active Life of the IDF. Active Life of a facility means the period from the initial receipt of dangerous waste at the facility until the department receives certification of final closure ([WAC 173-303-040](#)). The requirements of this chapter that do not apply to receipt and disposal of dangerous waste as defined in [WAC 173-303-040](#), shall be implemented by the Permittees during the Pre-Active Life of IDF. Pre-Active Life is not defined in the regulations, but refers to the facility maintenance period between final construction and the start of Active Life.

The IDF is designed and will be operated to minimize exposure of the general public and operating personnel to disposed waste. Shielding, contamination control, control of toxic or dangerous material, and safety and security procedures will be used to keep exposure as low as reasonably achievable (ALARA).

6.1 SECURITY

The following sections describe the security measures, equipment, and warning signs to be used to control entry to the IDF. A discussion of Hanford Facility security is provided in Attachment 33, Section 6.1.

6.1.1 Security Procedures and Equipment

The following sections describe the 24-hour surveillance system, barrier, and warning signs to be used to provide security and control access to the IDF.

6.1.1.1 24-Hour Surveillance System

The Hanford Facility is a controlled-access area [refer to Attachment 33, Section 6.1].

6.1.1.2 Barrier and Means to Control Entry

Because the IDF is located within the portion of the Hanford Facility controlled by the 24-hour surveillance system, [WAC 173-303-310](#)(2)(c) does not apply.

6.1.1.3 Warning Signs

Signs will be visible from all angles of approach, and legible from a distance of at least 7.6 meters. Each active area used for disposal will be posted with a sign, in English, reading, *DANGER-UNAUTHORIZED PERSONNEL KEEP OUT* or an equivalent legend.

6.1.2 Waiver

A waiver of the security procedures and equipment requirements for the IDF was not requested. Therefore, the requirements of [WAC 173-303-310](#)(1)(a) and (b) are not applicable.

1 **6.2 INSPECTION PLAN**

2 This section describes the method and schedule for inspections of the IDF. These inspections help to
3 ensure that situations do not exist that might cause or lead to the release of waste to the environment,
4 degradation of safety equipment and/or systems, or that might pose a threat to human health. Abnormal
5 conditions identified by inspections must be corrected.

6 **6.2.1 General Inspection Requirements**

7 The content and frequency of inspections are described in this section. Inspection discrepancies are
8 documented on inspection checklists and log sheets. The schedule and inspection records will be kept in
9 the inspection logbooks and retained by the IDF operations personnel. Inspection records will be retained
10 in accordance with Permit Condition II.I.1 and contain the following information:

- 11 • Date and time of inspection
- 12 • Printed name and the hand written signature of the inspector
- 13 • Notation of the observations made
- 14 • An account of spills or discharges in accordance with [WAC 173-303-145](#)
- 15 • Date and nature of any repairs or remedial actions taken.

16 The inspection checklists consist of a listing of items that are assessed during each inspection. A yes/no
17 response will be made for each listed item. A 'yes' response means that the item is in compliance with the
18 conditions stated on the checklist. Any problems identified during the inspection, as indicated by a 'no'
19 response on the checklist, will be reported immediately to the IDF operations supervisor.

20 **6.2.1.1 Types of Problems**

21 Types of problems looked for during an inspection in Pre-Active Life are in Table 6.2. Types of
22 problems looked for during an inspection in Active Life are in Table 6.3. Once the IDF begins to receive
23 dangerous waste, the requirements in Table 6.2 are no longer applicable. Each day mixed waste
24 containers and/or bulk waste are handled within the IDF; an operator will perform a daily inspection of
25 areas subject to spills (e.g., loading and unloading areas and waste handling areas).

26 **6.2.1.2 Frequency of Inspections**

27 Table 6.2 provides inspection frequencies during the Pre-Active Life. Tables 6.1, 6.2, and 6.3 provide
28 inspection frequencies during the Active Life. For clarification, areas with operations that may result in
29 spills are described below

30 Each step in the waste placement operation occurs in the landfill over the double HDPE liner system that
31 provides containment of any spill from the waste handling operation.

32 Waste Handling Operations involve the following:

- 33 • Unloading of the waste shipment in the landfill Placement of the cover soil over the waste container

34 During Active Life leachate,¹ movement occurs within the double-contained leachate handling
35 system. There is a potential for a leachate spill on the concrete containment slab of the Crest Pad
36 Building, Leachate Transfer Building, and/or the Leachate Loading Truck Pad.

¹ WAC 173-303-040 defines "Leachate" as any liquid, including any components suspended in the liquid that has percolated through or drained from dangerous waste.

1 Leachate Handling Operations involve the following:

- 2 • Pumping leachate from the collection sumps to the Crest Pad Building
- 3 • Activities within the Crest Pad Building
- 4 • Transfer of leachate to and from the double-lined Leachate Tanks
- 5 • All activities that occur in the Leachate Transfer Building
- 6 • Pumping of leachate to a tanker truck on the Truck Loading Pad

7 Liquid handling operations involve the following:

- 8 • The Secondary Leak Detection System (SLDS) is similar to the LDS, except that it is equipped with
9 liquid level indication instrumentation only. A low-capacity submersible pump can be inserted into
10 the SLDS sump if required. Pumping of liquid from the collection sump to the small, portable
11 container on the SLDS Pad may be required. Collected liquid in the SLDS that may be construction
12 water and/or liquid from other sources.

13 (Note that the secondary leak detection system is not a design requirement of [WAC 173-303-665](#),
14 however DOE has added the design feature pursuant to its authority under the Atomic Energy Act of 1954
15 (AEA) and not for the purposes of compliance with the dangerous waste regulations. Therefore,
16 information regarding the design, construction, and operation of the SLDS is provided for information
17 only. Pursuant to AEA, DOE has sole and exclusive responsibility and authority to regulate the source,
18 special nuclear and by-product material component of radioactive mixed waste at DOE-owned nuclear
19 facilities. Source, special nuclear and by-product materials, as defined by AEA, are not subject to
20 regulation under RCRA or the Hazardous Waste Management Act, by the State of Washington and are
21 not be subject to State dangerous waste permit, orders, or any other enforceable instrument issued there
22 under. DOE recognizes that radionuclide data may be useful in the development and confirmation of
23 geohydrologic conceptual models. Radionuclide data contained herein is therefore provided as a matter
24 of comity so the information may be used for such purposes).

25 **6.2.2 Schedule for Remedial Action for Problems Revealed**

26 The operating organization will remedy any problems revealed by the inspection on a schedule that
27 prevents hazards to human health and the environment. Where a hazard is imminent or already has
28 occurred immediate action will be taken. Immediate actions will be implemented based on ALARA
29 considerations, availability of supplies, equipment, and personnel.

30 **6.2.3 Specific Process or Waste Type Inspection Requirements**

31 The following sections detail the inspections to be performed at the IDF.

32 **6.2.3.1 Container Inspection**

33 On receipt, operations personnel will confirm appropriate documentation by inspecting each mixed
34 wasted container for disposal and compliance with the container receipt inspection criteria (Chapter 3.0)
35 before the mixed waste is placed in the IDF.

36 If present, off-specification waste and vitrified waste requiring cooling in storage will be subject to the
37 specific items and/or problems noted during weekly container inspection (Table 6.1) include the
38 following:

- 39 • Condition of trench floor and sides
- 40 • Container structural integrity
- 41 • Containers closed
- 42 • At a minimum, 76.2 centimeters aisle spacing

- 1 • Corrosion of containers
 - 2 • Evidence of spills or leaks
 - 3 • Container labels and markings in place, legible, and unobscured
 - 4 • Areas in and around stored waste are free of combustibles (e.g., tumbleweeds)
 - 5 • Waste separations such as tape, rope, chain or other cordon mechanism are intact.
- 6 If present, transport vehicles containing off specification waste or vitrified waste requiring cooling will be
7 subject to the specific items and/or problems noted during weekly inspection include the following:
- 8 • Transport vehicle structural integrity
 - 9 • At a minimum, 76.2 centimeters aisle spacing between transporters
 - 10 • Evidence of spills or leaks
 - 11 • Areas in and around transport vehicles are free of combustibles (e.g. tumbleweeds)
 - 12 • Separations such as tape, rope, chain or other cordon mechanism are intact.
- 13 Transport vehicles will not be subject to an individual container inspection within the transporter.
14 Records of inspection will be maintained as detailed in Section 6.2.1.

15 **6.2.3.2 Landfill Inspection**

16 The IDF will be inspected according to the frequencies in Table 6.2 during Pre-Active Life and in
17 accordance with Table 6.3 during Active Life.

18 **6.2.3.2.1 Run-on and Runoff Control System**

19 A run-on control system is installed around the perimeter of each lined trench (Chapter 4.0). The system
20 consists of a berm along the outer margin of each trench that prevents run-on from entering the trench.
21 All run-on control system berms are inspected quarterly (Table 6.2) and after storms for signs of
22 deterioration, malfunction, or improper operation. During Active Life, any precipitation that falls
23 between the run-on control berm and the edge of the trench excavation eventually might flow into the
24 primary leachate control and removal system sump and will be treated as leachate.

25 **6.2.3.2.2 Leak Detection System**

26 During pre-active life, the leak detection system will be monitored quarterly and after storms (Table 6.2)
27 for the amount of liquid removed. To calculate the action leakage rate, measurements are needed to be
28 collected over five consecutive days each quarter. The action leakage rate will be determined for the
29 quarter using these measurements collected during one five day work week each quarter.

30 During Active life (Table 6.3), Leak detection for lined trench at the IDF is accomplished by the
31 following:

- 32 • Monitoring liquid level above the secondary liner
- 33 • Monitoring liquid levels above primary liner
- 34 • Inspecting for the presence of liquids after significant precipitation events
- 35 • Verifying certain gauges and instruments are in current calibration; calibration is performed annually
36 or more frequently at intervals suggested by the manufacturer (Chapter 4.0, Section 4.3.7.4)
- 37 • Recording secondary sump levels on a daily action leakage rate calculation sheet (Figure 6.1).

38 If the action leakage rate (Chapter 4.0, Appendix 4C) has not been exceeded, the liner system will be
39 functioning properly.

1 **6.2.3.2.3 Wind Dispersal Control System**

2 During pre-active life, berms will be inspected quarterly and after storms to ensure the berms are
3 functioning properly (Table 6.2).

4 During active life (Table 6.3), Waste is inspected on receipt for evidence of damage, corrosion, or
5 deterioration that might lead to dispersal of the contents.

6 Unpackaged or bulk waste with any potential for wind dispersal is covered or sprayed with fixative after
7 being placed in a trench.

8 In addition, unpackaged or bulk waste handling operations are suspended in winds exceeding
9 24 kilometers per hour unless specifically approved by operations supervisors. The supervisor only
10 would grant approval to operate in winds over 24 kilometers per hour after determining that the risk to
11 human health or the environment would be diminished by completing the work activity, or that the nature
12 and form of the waste handling activity was such that the wind speed would have no significant impact.

13 **6.2.3.2.4 Leachate Collection and Removal System**

14 During pre-active life, the Leachate Collection and Removal System is inspected quarterly and after
15 storms (Table 6.2) for the presence of liquids, and that the system is functioning properly.

16 During active-life (Table 6.3), Liquids in the Leachate Collection and Removal System and Leak
17 Detection System are monitored daily to ensure the action leakage rate (Chapter 4.0, Appendix 4A) is not
18 exceeded and will be inspected per Table 6.2. In addition, a flow meter is used to check if the amount of
19 actual leachate pumped corresponds to the amount accumulated in the leachate collection tank. This
20 check will verify the proper function of the leachate collection and removal sump pumps with each use.

21 ~~In addition, evaluations on the leachate transfer lines for freeze and thaw damage will be conducted when~~
22 ~~appropriate.~~

23 **6.3 PREPAREDNESS AND PREVENTION REQUIREMENTS**

24 Section 6.3.1 describes the preparedness and prevention measures to be implemented during Pre-Active
25 Life. Sections 6.3.2 through 6.3.7 describe the preparedness and prevention measures taken at the IDF
26 during Active Life.

27 **6.3.1 Pre-Active Life Preparedness and Prevention**

28 During Pre-Active Life, the Permittees will comply with Permit Attachment 4, Hanford Emergency
29 Management Plan (DOE/RL-94-02) as applicable for a facility that does not contain dangerous waste. An
30 emergency coordinator will be assigned to IDF who will manage and control all aspects of the initial
31 facility response when an emergency occurs.

32 **6.3.2 Equipment Requirements**

33 The following sections describe the internal and external communications systems and the emergency
34 equipment required.

35 **6.3.3 Internal Communication**

36 There is one building, MO-518, equipped to support communications. Immediate emergency instruction
37 to personnel working at the IDF will be provided by cellular telephones.

38 **6.3.4 External Communications**

39 Personnel at the IDF will have voice communication or equivalent (e.g., hand signals) during work
40 assignments to maintain external communications with shift supervisors. Supervision will contact the

1 Hanford Facility emergency telephone number (911) (373-3800 for cellular telephones) if assistance is
2 needed in the field.

3 **6.3.5 Emergency Equipment**

4 Emergency equipment will be available for use at the IDF. A list of equipment is included in the
5 contingency plan (Addendum J.1, Pre-Active Life, and Addendum J.2, Active Life).

6 The Hanford Facility relies primarily on the Hanford Fire Department to control fires. Emergency
7 equipment will not be located at IDF trenches. Portable fire extinguishers will be carried on IDF
8 operations vehicles. Attachment 4, *Hanford Emergency Management Plan*, (DOE/RL-94-02) identifies
9 the trained firefighting and emergency medical personnel and equipment.

10 **6.3.6 Water for Fire Control**

- 11 • Hanford Fire Department trucks as described in Permit Attachment 4, *Hanford Emergency*
12 *Management Plan*, (DOE/RL-94-02); and fire hydrants described in Addendum J.1 and
13 Addendum J.2 supply water for fire control at the IDF.

14 **6.3.7 Aisle Spacing Requirements for Off-Specification Waste**

15 Aisle spacing during off-specification and cooling vitrified waste storage operations is sufficient to allow
16 the movement of personnel and fire protection equipment in and around the containers. This aisle spacing
17 meets the requirements of [WAC 173-303-340](#)(3). Inspection aisle space must be at least 76.2 centimeters.
18 During off-specification storage operations, rows of containers are placed no more than two containers
19 wide in accordance with [WAC 173-303-630](#)(5)(c). Aisle spacing requirements will be applied to
20 transport vehicles but not to the waste within the transport vehicles.

21 **6.4 PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT**

22 The following sections will apply during the Active Life for the IDF and describe preventive procedures,
23 structures, and equipment.

24 **6.4.1 Unloading Operations**

25 Methods used to prevent release of waste during unloading operations will be employed as follows.

- 26 • Waste will be inspected according to the receipt inspection criteria (Chapter 3.0).
27 – If waste fails the inspection, it will be designated as an off-specification waste and could be
28 placed in the storage area or returned to the generator.
- 29 • Containers and bulk waste will be handled by appropriate equipment (i.e., crane) during unloading.
- 30 • Path from loading area to trench area will be clear of obstructions.

31 Spills will be managed as identified in the contingency plan (Addendum J.2).

32 Containers and bulk waste will be staged at the waste unloading area no longer than necessary for
33 placement into the landfill. Administrative procedures may prevent immediate unloading and backfilling
34 of waste containers. Containers might be left in the transporters as needed to resolve the administrative
35 procedure requirements or to support the operational schedule before containers are placed into the
36 landfill. The transfer vehicle containing vitrified waste requiring cooling may be temporarily placed in
37 the storage area prior to unloading for disposal.

38 **6.4.2 Runoff**

39 The waste in the IDF will be placed below the land surface; thus, the IDF is designed to prevent run-off of
40 precipitation that might have come in contact with the waste. The land surface is relatively level, so

1 trenches have only internal drainage. The minimal amounts of precipitation that accumulate are
2 contained within the trench.

3 The IDF trench is designed to channel run-on liquid away from the trench. Precipitation that percolates to
4 the bottom of the trench is captured in the leachate collection system and is managed as rainwater during
5 Pre Active Life. During Active Life, these liquids will be managed as multi-source leachate waste.

6 **6.4.3 Water Supplies**

7 The design and operation of the IDF during Active Life is intended to minimize the generation of
8 potentially contaminated leachate and to prevent leachate migration into groundwater resources in the
9 local area. All activities performed during Active Life (Chapter 4.0) or Pre-active Life is designed to
10 protect local water supplies.

11 Activities that prevent contamination of water supplies or groundwater will include the following:

- 12 • Placement of waste in lined trenches
 - 13 – Run-on and run-off will be controlled
 - 14 – Leak detection systems will be used
 - 15 – Leachate will be collected and managed as waste
 - 16 – Inspections will be performed
- 17 • Placement of backfill will occur after a layer of waste has been placed in the trench.

18 **6.4.4 Equipment and Power Failure**

19 Electrical power is required for the landfill. Electricity supplies power to the sump pumps used to remove
20 accumulated leachate from the primary and secondary liners. Electricity outages will be restored as soon
21 as possible. Backup equipment will be acquired if necessary to provide electrical service. Failed
22 equipment will be repaired or replaced as soon as possible.

23 **6.4.5 Personal Protection Equipment**

24 Personnel will be trained in the use of applicable personal protection equipment. .The protective clothing
25 required for Active Life will vary depending on the form and content of the waste.

26 **6.5 PREVENTION OF REACTION OF IGNITABLE, REACTIVE, AND INCOMPATIBLE** 27 **WASTE**

28 The waste acceptance criteria will prohibit the disposal of ignitable, reactive, and incompatible waste at
29 the IDF. Waste acceptance criteria (Chapter 3.0) will ensure that the required treatment has been
30 performed before the waste is disposed in the IDF.

31 Waste stream compatibility (i.e., compatibility between individual waste streams and compatibility
32 between waste streams and landfill design and construction parameters) will be assessed on a case-by-
33 case basis. Criteria for assessing and determining compatibility will be identified in either the facility
34 Waste Acceptance Criteria, Waste Analysis Plan, or other protocol or procedure as appropriate
35 (Chapter 3.0) for further discussion of waste stream compatibility.

36

1

Table 6.1. Container Storage Inspections

| Requirement Description | Inspection Frequency | Types Of Problems |
|---|----------------------|--|
| -630(6) Containers | Weekly | Leaking Containers Deteriorating containers |
| -630(6) Containment System | Weekly | Deteriorating containment system |
| -395(1)(d) Ignitable or reactive waste | Not Applicable | Not Applicable |

2

Table 6.2. Landfill Inspections during Pre-Active Life***

| Requirement Description | Inspection Frequency | Types Of Problems |
|--|--|---|
| -665(4)(b)(i) Run-on and run-off control | Quarterly and after storms* | Deterioration, malfunction, or improper operation |
| -665(4)(b)(ii) Wind dispersal control systems | Quarterly and after storms* | Proper functioning |
| -665(4)(b)(iii) Leachate collection and removal systems | Quarterly and after storms* | Presence of <u>liquids</u> leachate; proper functioning |
| -665(4)(c)(i) Leak detection system sump | Quarterly and after storms* | Amount of liquids removed |
| Secondary leak detection system sump** | <u>Quarterly</u> <u>Monthly</u> ** | Presence of unexpected liquid volume** |
| Security "Danger unauthorized personnel keep out" signs | Quarterly | Signs are posted and legible |
| Areas subject to spills | Daily when any activities may take place that have a potential for a spill or release to occur | Evidence of spills |

3

*A storm is any atmospheric disturbance with either wind gust of 56.3 kilometers per hour (35 miles per hour) or greater, or precipitation of 0.5 inch or greater within a 24-hour period.

4

5

**Note: Secondary leak detection system is not a design requirement of WAC 173-303-665, however DOE is adding the design feature pursuant to its authority under the Atomic Energy Act of 1954 (AEA) and not for the purposes of compliance with the dangerous waste regulations. Therefore, formation regarding the design, construction, and operation of the secondary leak detection system is provided for information only. Pursuant to AEA, DOE has sole and exclusive responsibility and authority to regulate the source, special nuclear and by-product material component of radioactive mixed waste at DOE-owned nuclear facilities. Source, special nuclear and by-product materials, as defined by AEA, are not subject to regulation under RCRA or the Hazardous Waste Management Act, by the State of Washington and are not be subject to State dangerous waste permit, orders, or any other enforceable instrument issued there under. DOE recognizes that radionuclide data may be useful in the development and confirmation of geohydrologic conceptual models. Radionuclide data contained herein is therefore provided as a matter of comity so the information may be used for such purposes.

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*** Once the IDF begins to receive dangerous waste, the requirements in Table 6.2 are no longer applicable, and inspection requirements will be as provided in Table 6.32A

17

18

Table 6.3. Landfill Inspections during Active Life

| Requirement Description | Inspection Frequency | Types Of Problems |
|---|--|---|
| -665(4)(b)(i) Run-on and run-off control | Weekly and after storms* | Deterioration, malfunction, or improper operation |
| -665(4)(b)(ii) Wind dispersal control systems | Weekly and after storms* | Proper functioning |
| -665(4)(b)(iii) Leachate collection and removal systems | Weekly and after storms* | Presence of leachate; proper functioning |
| -665(4)(c)(i) Leak detection system sump | Weekly and after storms* | Amount of liquids removed |
| Secondary leak detection system sump** | Monthly** | Presence of unexpected liquid volume** |
| Security devices: "Danger unauthorized personnel keep out" signs | Weekly | Signs are posted and legible |
| Areas subject to spills | Daily when waste management activities having a potential for a spill to occur | Evidence of spills |

1 | *A storm is any atmospheric disturbance with either wind gust of 56.3 kilometers per hour (35 miles per hour) or greater, or
 2 | precipitation of 0.5 inch or greater within a 24-hour period.

3 | **Note: Secondary leak detection system is not a design requirement of WAC 173-303-665, however DOE is
 4 | adding the design feature pursuant to its authority under the Atomic Energy Act of 1954 (AEA) and not for
 5 | the purposes of compliance with the dangerous waste regulations. Therefore, formation regarding the
 6 | design, construction, and operation of the secondary leak detection system is provided for information
 7 | only. Pursuant to AEA, DOE has sole and exclusive responsibility and authority to regulate the source,
 8 | special nuclear and by-product material component of radioactive mixed waste at DOE-owned nuclear
 9 | facilities. Source, special nuclear and by-product materials, as defined by AEA, are not subject to regulation
 10 | under RCRA or the Hazardous Waste Management Act, by the State of Washington and are not be subject
 11 | to State dangerous waste permit, orders, or any other enforceable instrument issued there under. DOE
 12 | recognizes that radionuclide data may be useful in the development and confirmation of geohydrologic
 13 | conceptual models. Radionuclide data contained herein is therefore provided as a matter of comity so the
 14 | information may be used for such purposes.

| 1 | Addendum C | Process Information |
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C. PROCESS INFORMATION

This addendum provides a detailed discussion of the LERF and 200 Area ETF processes and equipment. The LERF and 200 Area ETF comprise an aqueous waste treatment system located in the 200 East Area that provides storage and treatment for a variety of aqueous mixed waste. This aqueous waste includes process condensate from the 242-A Evaporator 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 the Final Delisting ([40 CFR 261](#), Appendix IX, Table 2).

C.1 LIQUID EFFLUENT RETENTION FACILITY PROCESS DESCRIPTION

Each of the three LERF basins has an operating capacity of 29.5-million liters. The LERF receives aqueous waste through several inlets including the following:

- A pipeline that connects LERF with the 242-A Evaporator
- A pipeline from the 200 West Area
- A pipeline that connects LERF to the Load-In Station at the 200 Area ETF
- A series of sample ports located at each basin.

Figure C.1 presents a general layout of LERF and associated pipelines. Aqueous waste from LERF is pumped to the 200 Area ETF through one of two double-walled fiberglass transfer pipelines. Effluent from the 200 Area ETF also can be transferred back to the LERF through one of these transfer pipelines. These pipelines are equipped with leak detection located in the annulus between the inner and outer pipes. In the event that these leak detectors are not in service, the pipelines are visually inspected during transfers for leakage by opening the secondary containment drain lines located at the 200 Area ETF end of the transfer pipelines.

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 aqueous waste receipt piping (except for aqueous waste received from the 242-A Evaporator), 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 and allows samples to be collected from any depth. Personnel access to these sample ports is from the perimeter area of the basins.

A catch basin is provided at the northwest corner of each LERF basin for aboveground piping and manifolds for transfer pumps. Aqueous waste from the 242-A Evaporator is transferred through piping which ties into piping at the catch basins. Under routine operations, a submersible pump is used to transfer aqueous waste from a LERF basin to the 200 Area ETF for processing or for basin-to-basin transfers. This pump is connected to a fixed manifold on one of four available risers.

Each basin consists of a multilayer liner system supported by a concrete anchor wall around the basin perimeter and a soil-bentonite clay underlayment. The multilayer liner system consists of a primary liner in contact with the aqueous waste, a layer of bentonite carpet, a geonet, a geotextile, a gravel layer, and a secondary liner that rests on the bentonite underlayment. Any aqueous waste leakage through the primary liner flows through the geonet and gravel to a leachate collection system. The leachate flows to a sump at the northwest corner of each basin, where the leachate is pumped up the side slope and back into the basin above the primary liner. Each liner is constructed of high-density polyethylene. A floating cover made of very low-density polyethylene is stretched over each basin above the primary liner. These covers serve to keep unwanted material from entering the basins, and to minimize evaporation of the liquid contents.

1 **C.2 EFFLUENT TREATMENT FACILITY PROCESS DESCRIPTION**

2 The 200 Area ETF is designed as a flexible treatment system that provides treatment for contaminants
3 anticipated in process condensate and other onsite aqueous waste. The design influent flow rate into the
4 200 Area ETF is approximately 570 liters per minute, with planned outages for activities such as
5 maintenance on the 200 Area ETF systems. Maintenance outages typically are scheduled between
6 treating a batch of aqueous waste, referred to as treatment campaigns. The effluent flow (or volume) is
7 equivalent to the influent flow (or volume).

8 The 200 Area ETF generally receives aqueous waste directly from the LERF. However, aqueous waste
9 also can be transferred from tanker trucks at the Load-In Station to the 200 Area ETF and from containers
10 (e.g., carboys, drums) directly to ETF. Aqueous waste is treated and stored in the 200 Area ETF process
11 areas in a series of tank systems, referred to as process units. Within the ETF, waste also is managed in
12 containers through treatment and/or storage. Figure C.2 provides the relative locations of the process and
13 container storage areas within the ETF.

14 The process units are grouped in either the primary or the secondary treatment train. The primary
15 treatment train provides for the removal or destruction of contaminants. Typically, the secondary
16 treatment train processes the waste by-products from the primary treatment train by reducing the volume
17 of waste. In the secondary treatment train, contaminants are concentrated and dried to a powder. The
18 liquid fraction is routed to the primary treatment train. Figure C.3 provides an overview of the layout of
19 the ETF, 2025E Building). Figure C.4 presents the 200 Area ETF floor plan, the relative locations of the
20 individual process units and associated tanks within the ETF, and the location of the Load-In Station.

21 The dry powder waste and maintenance and operations waste are containerized and stored or treated in
22 the container storage areas or in collection or treatment areas within the Process Area. Secondary
23 containment is provided for all containers and tank systems (including ancillary equipment) housed
24 within the ETF. The trenches and floor of the 200 Area ETF comprise the secondary containment system.
25 The floor includes approximately a 15.2-centimeter rise (berm) along the containing walls of the process
26 and container storage areas. Any spilled or leaked material from within the process area or container
27 storage area is collected into trenches that feed into either sump tank 1 or sump tank 2. From these sump
28 tanks, the spilled or leaked material (i.e., waste) is fed to either the surge tank and processed in the
29 primary treatment train or the secondary waste receiving tanks and processed in the secondary treatment
30 train. All tank systems outside of the 200 Area ETF are provided with a secondary containment system.

31 In the following sections, several figures are provided that present general illustrations of the treatment
32 units and the relation to the process.

33 **C.2.1 Load-In Station**

34 The 200 Area ETF receives aqueous waste from LERF or the Load-In Station. The 200 Area ETF Load-
35 In Station, located due east of the surge tank and outside of the perimeter fence (Figure C.4), was
36 designed and constructed to provide the capability to unload, store, and transfer aqueous waste to the
37 LERF or 200 Area ETF from tanker trucks and other containers (such as drums). The Load-In Station
38 consists of two truck bays equipped with load-in tanks, transfer pumps, filtration system, level
39 instrumentation for tanker trucks, leak detection capabilities for the containment basin and transfer line,
40 and an underground transfer line that connects to lines in the surge tank berm, allowing transfers to either
41 the 200 Area ETF surge tank or LERF. The Load-In Station is covered with a steel building for weather
42 protection. Tanker trucks and other containers are used to unload aqueous waste at the Load-In Station.
43 To perform unloading, the tanker truck is positioned on a truck pad, a 'load-in' transfer line is connected
44 to the truck, and the tanker contents are pumped into one of the Load-In Station tanks, the surge tank, or
45 directly to the LERF. For container unloading, the container is placed on the truck pad and the container
46 contents are pumped into one of the Load-In Station tanks, the surge tank, or directly to the LERF.

1 During unloading operations, solids may be removed from the waste by pumping the contents of the
2 tanker truck or container through a filtration system. If solids removal is not needed, the filtration system
3 is not used and the solution is transferred directly to the Load-In Station tanks, surge tank, or to LERF.

4 Any leaks at the Load-In Station drain to the sump. A leak detector in the sump alarms locally and in the
5 200 Area ETF control room. Alternatively, leaks can be visually detected.

6 **C.2.2 Effluent Treatment Facility Operating Configuration**

7 Because the operating configuration of the 200 Area ETF can be adjusted or modified, most aqueous
8 waste streams can be effectively treated to below Delisting and Discharge Permit limits. The operating
9 configuration of the 200 Area ETF depends on the unique chemistry of an aqueous waste stream(s).
10 Before an aqueous waste stream is accepted for treatment, the waste is characterized and evaluated.
11 Information from the characterization is used to adjust the treatment process or change the configuration
12 of the 200 Area ETF process units, as necessary, to optimize the treatment process for a particular
13 aqueous waste stream.

14 Typically, an aqueous waste is processed first in the primary treatment train, where the 200 Area ETF is
15 configured to process an aqueous waste through the UV/OX unit first, followed by the RO unit.
16 However, under an alternate configuration, an aqueous waste could be processed in the RO unit first. For
17 example, high concentrations of nitrates in an aqueous waste might interfere with the performance of the
18 UV/OX. In this case, the 200 Area ETF could be configured to process the waste in the RO unit before
19 the UV/OX unit.

20 The flexibility of the 200 Area ETF also allows some aqueous waste to be processed in the secondary
21 treatment train first. For example, for small volume aqueous waste with high concentrations of some
22 anions and metals, the approach could be to first process the waste stream in the secondary treatment
23 train. This approach would prevent premature fouling or scaling of the RO unit. The liquid portion (i.e.,
24 untreated overheads from the 200 Area ETF evaporator and thin film dryer) would be sent to the primary
25 treatment train.

26 Figure C.5 and Figure C.6 provide example process flow diagrams for two different operating
27 configurations.

28 **C.2.3 Primary Treatment Train**

29 The primary treatment train consists of the following processes:

- 30 • Influent Receipt/Surge tank - inlet, surge capacity
- 31 • Filtration - for suspended solids removal
- 32 • UV/OX - organic destruction
- 33 • pH adjustment - waste neutralization
- 34 • Hydrogen peroxide decomposition - removal of excess hydrogen peroxide
- 35 • Degasification - removal of carbon dioxide
- 36 • RO - removal of dissolved solids
- 37 • IX - removal of dissolved solids
- 38 • Verification - holding tanks during verification

39 **Influent Receipt/Surge Tank.** Depending on the configuration of the ETF, the surge tank is one inlet
40 used to feed an aqueous waste into the 200 Area ETF for treatment. In Configuration 1 (Figure C.5), the
41 surge tank is the first component downstream of the LERF. The surge tank provides a storage/surge
42 volume for chemical pretreatment and controls feed flow rates from the LERF to the 200 Area ETF.
43 However, in Configuration 2 (Figure C.6), aqueous waste from LERF is fed directly into the treatment
44 units. In this configuration, the surge tank receives aqueous waste, which has been processed in the RO
45 units, and provides the feed stream to the remaining downstream process units. In yet another
46 configuration, some small volume aqueous waste could be received into the secondary treatment train
47 first for processing. In this case, the aqueous waste would be received directly into the secondary waste

1 receiving tanks. Finally, the surge tank also receives waste extracted from various systems within the
2 primary and secondary treatment train while in operation.

3 The surge tank is located outside the 200 Area ETF on the south side. In the surge tank (Figure C.7), the
4 pH of an aqueous waste is adjusted using the metered addition of sulfuric acid and sodium hydroxide, as
5 necessary, to prepare the waste for treatment in downstream processes. In addition, hydrogen peroxide or
6 biocides could be added to control biological growth in the surge tank. A pump recirculates the contents
7 in the surge tank, mixing the chemical reagents with the waste to a uniform pH.

8 **Filtration.** Two primary filter systems remove suspended particles in an aqueous waste: a rough filter
9 removes the larger particulates, while a fine filter removes the smaller particulates. The location of these
10 filters depends on the configuration of the primary treatment train. However, the filters normally are
11 located upstream of the RO units.

12 The solids accumulating on these filter elements are backwashed to the secondary waste receiving tanks
13 with pulses of compressed air and water, forcing water back through the filter. The backwash operation is
14 initiated either automatically by a rise in differential pressure across the filter or manually by an operator.
15 The filters are cleaned chemically when the backwashing process does not facilitate acceptable filter
16 performance.

17 Auxiliary fine and rough filters (e.g., disposable filters) have been installed to provide additional filtration
18 capabilities. Depending on the configuration of the ETF, the auxiliary filters are operated either in series
19 with the primary filters to provide additional filtration or in parallel, instead of the primary fine and rough
20 filters, to allow cleaning/maintenance of the primary fine and rough filters while the primary treatment
21 train is in operation.

22 **Ultraviolet Light/Oxidation.** Organic compounds contained in an aqueous waste stream are destroyed
23 in the UV/OX system (Figure C.8). Hydrogen peroxide is mixed with the waste. The UV/OX system
24 uses the photochemical reaction of UV light on hydrogen peroxide to form hydroxyl radicals and other
25 reactive species that oxidize the organic compounds. The final products of the complete reaction are
26 carbon dioxide, water, and inorganic ions.

27 Organic destruction is accomplished in two UV/OX units operating in parallel. During the UV/OX
28 process, the aqueous waste passes through reaction chambers where hydrogen peroxide is added. While
29 in the UV/OX system, the temperature of an aqueous waste is monitored. Heat exchangers are used to
30 reduce the temperature of the waste should the temperature of the waste approach the upper limits for the
31 UV/OX or RO systems.

32 **pH Adjustment.** The pH of a waste stream is monitored and controlled at different points throughout the
33 treatment process. Within the primary treatment train, the pH of a waste can be adjusted with sulfuric
34 acid or sodium hydroxide to optimize operation of downstream treatment processes or adjusted before
35 final discharge. For example, the pH of an aqueous waste would be adjusted in the pH adjustment tank
36 after the UV/OX process and before the RO process. In this example, pH is adjusted to cause certain
37 chemical species such as ammonia to form ammonium sulfate, thereby increasing the rejection rate of the
38 RO.

39 **Hydrogen Peroxide Decomposition.** Typically, hydrogen peroxide added into the UV/OX system is not
40 consumed completely by the system. Because hydrogen peroxide is a strong oxidizer, the residual
41 hydrogen peroxide from the UV/OX system is removed to protect the downstream equipment. The
42 hydrogen peroxide decomposer uses a catalyst to break down the hydrogen peroxide that is not consumed
43 completely in the process of organic destruction. The aqueous waste is sent through a column that breaks
44 down the hydrogen peroxide into water and oxygen. The gas generated by the decomposition of the
45 hydrogen peroxide is vented to the vessel off gas system.

46 **Degasification.** The degasification column is used to purge dissolved carbon dioxide from the aqueous
47 waste to reduce the carbonate loading to downstream dissolved solids removal processes within the
48 200 Area ETF primary treatment train. The purged carbon dioxide is vented to the vessel off gas system.

1 **Reverse Osmosis.** The RO system (Figure C.9) uses pressure to force clean water molecules through
2 semi-permeable membranes while keeping the larger molecule contaminants, such as dissolved solids,
3 and large molecular weight organic materials, in the membrane. The RO process uses a staged
4 configuration to maximize water recovery. The process produces two separate streams, including a clean
5 'permeate' and a concentrate (or retentate), which are concentrated as much as possible to minimize the
6 amount of secondary waste produced.

7 The RO process is divided into first and second stages. Aqueous waste is fed to the first RO stage from
8 the RO feed tank. The secondary waste receiving tanks of the secondary treatment train receive the
9 retentate removed from the first RO stage, while the second RO stage receives the permeate (i.e., 'treated'
10 aqueous waste from the first RO stage). In the second RO stage, the retentate is sent to the first stage RO
11 feed tank while the permeate is sent to the IX system or to the surge tank, depending on the configuration
12 of the ETF.

13 Two support systems facilitate this process. An anti-scale system injects scale inhibitors as needed into
14 the feed waste to prevent scale from forming on the membrane surface. A clean-in-place system using
15 cleaning agents, such as descalants and surfactants, cleans the membrane pores of surface and subsurface
16 deposits that have fouled the membranes.

17 **Ion Exchange.** Because the RO process removes most of the dissolved solids in an aqueous waste, the
18 IX process (Figure C.10) acts as a polishing unit. The IX system consists of three columns containing
19 beds of cation and/or anion resins. This system is designed to allow for regeneration of resins and
20 maintenance of one column while the other two are in operation. Though the two columns generally are
21 operated in series, the two columns also can be operated in parallel or individually.

22 Typically, the two columns in operation are arranged in a primary/secondary (lead/lag) configuration, and
23 the third (regenerated) column is maintained in standby. When dissolved solids breakthrough the first
24 IX column and are detected by a conductivity sensor, this column is removed from service for
25 regeneration, and the second column replaces the first column and the third column is placed into service.
26 The column normally is regenerated using sulfuric acid and sodium hydroxide. The resulting
27 regeneration waste is collected in the secondary waste receiving tanks.

28 Spent resins are transferred into a disposal container should regeneration of the IX resins become
29 inefficient. Free water is removed from the container and returned to the surge tank. Dewatered resins are
30 transferred to a final storage/disposal point.

31 **Verification.** The three verification tanks (Figure C.11) are used to hold the treated effluent while a
32 determination is made that the effluent meets discharge limits. The effluent can be returned to the
33 primary treatment train for additional treatment, or to the LERF, should a treated effluent not meet
34 Discharge Permit or Final Delisting requirements.

35 The three verification tanks alternate between three operating modes: receiving treated effluent, holding
36 treated effluent during laboratory analysis and verification, or discharging verified effluent. Treated
37 effluent may also be returned to the 200 Area ETF to provide 'clean' service water for operational and
38 maintenance functions, e.g., for boiler water and for backwashing the filters. This recycling keeps the
39 quantity of fresh water used to a minimum.

40 **C.2.4 Secondary Treatment Train**

41 The secondary treatment system typically receives and processes the following by-products generated
42 from the primary treatment train: concentrate from the first RO stage, filter backwash, regeneration waste
43 from the ion exchange system, and spillage or overflow received into the process sumps. Depending on
44 the operating configuration, however, some aqueous waste could be processed in the secondary treatment
45 train before the primary treatment train (refer to Figure C.5 and Figure C.6 for example operating
46 configurations).

47 The secondary treatment train provides the following processes:

- 1 • Secondary waste receiving - tank receiving and chemical addition
- 2 • Evaporation - concentrates secondary waste streams
- 3 • Concentrate staging - concentrate receipt, pH adjustment, and chemical addition
- 4 • Thin film drying - dewatering of secondary waste streams
- 5 • Container handling - packaging of dewatered secondary waste

6 **Secondary Waste Receiving.** Waste to be processed in the secondary treatment train is received into two
7 secondary waste receiving tanks, where the pH can be adjusted with sulfuric acid or sodium hydroxide for
8 optimum evaporator performance. Chemicals, such as reducing agents, may be added to waste in the
9 secondary waste receiving tanks to reduce the toxicity or mobility of constituents in the powder.

10 **Evaporation.** The 200 Area ETF evaporator is fed alternately by the two secondary waste receiving
11 tanks. One tank serves as a waste receiver while the other tank is operated as the feed tank. The
12 200 Area ETF evaporator vessel (also referred to as the vapor body) is the principal component of the
13 evaporation process (Figure C.12).

14 Feed from the secondary waste receiving tanks is pumped through a heater to the recirculation loop of the
15 200 Area ETF evaporator. In this loop, concentrated waste is recirculated from the 200 Area ETF
16 evaporator, to a heater, and back into the evaporator where vaporization occurs. As water leaves the
17 evaporator system in the vapor phase, the concentration of the waste in the evaporator increases. When
18 the concentration of the waste reaches the appropriate density, a portion of the concentrate is pumped to
19 one of the concentrate tanks.

20 The vapor that is released from the 200 Area ETF evaporator is routed to the entrainment separator, where
21 water droplets and/or particulates are separated from the vapor. The 'cleaned' vapor is routed to the vapor
22 compressor and converted to steam. The steam from the vapor compressor is sent to the heater (reboiler)
23 and used to heat the recirculating concentrate in the 200 Area ETF evaporator. From the heater, the steam
24 is condensed and fed to the distillate flash tank, where the saturated condensate received from the heater
25 drops to atmospheric pressure and cools to the normal boiling point through partial flashing (rapid
26 vaporization caused by a pressure reduction). The resulting distillate is routed to the surge tank. The
27 non-condensable vapors, such as air, are vented through a vent gas cooler to the vessel off gas system.

28 **Concentrate Staging.** The concentrate tanks make up the head end of the thin film drying process. From
29 the 200 Area ETF evaporator, concentrate is pumped into two concentrate tanks, and pH adjusted
30 chemicals, such as reducing agents, may be added to reduce the toxicity or mobility of constituents when
31 converted to powder. Waste is transferred from the concentrate tanks to the thin film dryer for conversion
32 to a powder. The concentrate tanks function alternately between concentrate receiver and feed tank for
33 the thin film dryer. However, one tank may serve as both concentrate receiver and feed tank.

34 Because low solubility solids (i.e., calcium and magnesium sulfate) tend to settle in the concentrate tanks,
35 these solids must be removed to prevent fouling and to protect the thin film dryer, and to maintain
36 concentrate tank capacity.

37 **Thin Film Drying.** From the concentrate tanks, feed is pumped to the thin film dryer (Figure C.13) that
38 is heated by steam. As the concentrated waste flows down the length of the dryer, the waste is dried. The
39 dried film, or powder, is scraped off the dryer cylinder by blades attached to a rotating shaft. The powder
40 is funneled through a cone-shaped powder hopper at the bottom of the dryer and into the Container
41 Handling System.

42 Overhead vapor released by the drying of the concentrate is condensed in the distillate condenser. Excess
43 heat is removed from the distillate by a water-cooled heat exchanger. Part of the distillate is circulated
44 back to the condenser spray nozzles. The remaining distillate is pumped to the surge tank. Any
45 noncondensable vapors and particulates from the spray condenser are exhausted to the vessel off gas
46 system.

47 **Container Handling.** Before an empty container is moved into the Container Handling System
48 (Figure C.14), the lid is removed and the container is placed on a conveyor. The containers are moved

1 into the container filling area after passing through an air lock. The empty container is located under the
2 thin film dryer, and raised into position. The container is sealed to the thin film dryer and a rotary valve
3 begins the transfer of powder to the empty container. Air displaced from the container is vented to the
4 distillate condenser attached to the 200 Area ETF evaporator that exhausts to the vessel off gas system.

5 The container is filled to a predetermined level, then lowered from the thin film dryer and moved along a
6 conveyor. The filled container is manually recapped, and moved along the conveyor to the airlock. At
7 the airlock, the container is moved onto the conveyor by remote control. The airlock is opened, the smear
8 sample (surface wipe) is taken, and the contamination level counted. A 'C' ring is installed to secure the
9 container lid. If the container has contaminated material on the outside, the container is wiped down and
10 retested. Filled containers that pass the smear test are labeled, placed on pallets, and moved by forklift to
11 the filled container storage area. Section C.3 provides a more detailed discussion of container handling.

12 **C.2.5 Other Effluent Treatment Facility Systems**

13 The 200 Area ETF is provided with support systems that facilitate treatment in the primary and secondary
14 treatment trains and that provide for worker safety and environmental protection. An overview of the
15 following systems is provided:

- 16 • Monitor and control system
- 17 • Vessel off gas system
- 18 • Sump collection system
- 19 • Chemical injection feed system
- 20 • Verification tank recycle system
- 21 • Utilities

22 **C.2.5.1 Monitor and Control System**

23 The operation of the 200 Area ETF is monitored and controlled by a centralized computer system (i.e.,
24 monitor and control system or MCS). The MCS continuously monitors data from various field indicators,
25 such as pH, flow, tank level, temperature, pressure, conductivity, alarm status, and valve switch positions.
26 Data gathered by the MCS enable operations and engineering personnel to document and adjust the
27 operation of the ETF.

28 **C.2.5.2 Vessel Off gas System**

29 Ventilation for various tanks and vessels is provided through the vessel off gas system. The system
30 includes a moisture separator, duct heater, pre-filter, high-efficiency particulate air filters, carbon absorber
31 (when required to reduce organic emissions), exhaust fans, and ductwork. Gasses ventilated from the
32 tanks and vessels enter the exhaust system through the connected ductwork. The vessel off gas system
33 draws vapors and gasses off the following tanks and treatment systems:

- 34 • Surge tank
- 35 • Vent gas cooler (off the ETF evaporator/distillate flash tank)
- 36 • pH adjustment tank
- 37 • Concentrate tanks
- 38 • Degasification system
- 39 • First and second RO stages
- 40 • Dry powder hopper
- 41 • Effluent pH adjustment tank
- 42 • Drum capping station
- 43 • Secondary waste receiving tanks
- 44 • Distillate condenser (off the thin film dryer)
- 45 • Sump tanks 1 and 2

46 The vessel off gas system maintains a negative pressure with respect to the atmosphere, which produces a
47 slight vacuum within tanks, vessels, and ancillary equipment for the containment of gas vapor. This
48 system also provides for the collection, monitoring, and treatment of confined airborne in-vessel

1 contaminants to preclude over-pressurization. The high-efficiency particulate air filters remove
2 particulates and condensate from the air stream before these are discharged to the heating, ventilation, and
3 air conditioning system.

4 **C.2.5.3 Sump Collection System**

5 Sump tanks 1 and 2 compose the sump collection system that provides containment of waste streams and
6 liquid overflow associated with the 200 Area ETF processes. The process area floor is sloped to two
7 separate trenches that each drain to a sump tank located under the floor of the 200 Area ETF
8 (Figure C.15). One trench runs the length of the primary treatment train and drains to Sump Tank 2,
9 located underneath the verification tank pump floor. The second trench collects spillage primarily from
10 the secondary treatment train and flows to Sump Tank 1, located near the 200 Area ETF evaporator.
11 Sump tanks 1 and 2 are located below floor level (Figure C.15). An eductor in these tanks prevents
12 sludge from accumulating.

13 **C.2.5.4 Chemical Injection Feed System**

14 At several points within the primary and secondary treatment trains, sulfuric acid and sodium hydroxide
15 (or dilute solutions of these reagents) are metered into specific process units to adjust the pH. For
16 example, a dilute solution of 4 percent sulfuric acid and 4 percent sodium hydroxide could be added to
17 the secondary waste receiving tanks to optimize the evaporation process.

18 **C.2.5.5 Verification Tank Recycle System**

19 To reduce the amount of water added to the process, verification tank water (i.e., verified effluent) is
20 recycled throughout the 200 Area ETF process. Tanks and ancillary equipment that use verification tank
21 water include:

- 22 • 4 percent H₂SO₄ solution tank and ancillary equipment
- 23 • 4 percent NaOH solution tank and ancillary equipment
- 24 • Clean-in-place tank and ancillary equipment
- 25 • IX columns (during resin regeneration)
- 26 • 200 Area ETF evaporator boiler and ancillary equipment
- 27 • Thin film dryer boiler and ancillary equipment
- 28 • Seal water system. In addition, verification tank water is used extensively during maintenance
29 activities. For example, it may be used to flush piping systems or to confirm the integrity of piping, a
30 process tank or tank truck.

31 **C.2.5.6 Utilities**

32 The 200 Area ETF maintains the following utility supply systems required for the operation of the ETF:

- 33 • Cooling water system - removes heat from process water via heat exchangers and a cooling tower
- 34 • Compressed air system - provides air to process equipment and instrumentation
- 35 • Seal water system - provides cool, clean, pressurized water to process equipment for pump seal
36 cooling and pump seal lubrication, and provides protection against failure and fluid leakage
- 37 • Demineralized water system - removes solids from raw water system to produce high quality, low
38 ion-content, water for steam boilers, and for the hydrogen peroxide feed system.
- 39 • Heating, ventilation, and air conditioning system - provides continuous heating, cooling, and air
40 humidity control throughout the ETF.

41 The following utilities support 200 Area ETF activities:

- 42 • Electrical power
- 43 • Sanitary water
- 44 • Communication systems
- 45 • Raw water

1 **C.3 CONTAINERS**

2 This section provides specific information on container storage and treatment operations at the 200 Area
3 ETF, including descriptions of containers, labeling, and secondary containment structures.

4 A list of dangerous and/or mixed waste managed in containers at the 200 Area ETF is presented in
5 Addendum A. The types of dangerous and/or mixed waste managed in containers in the 200 Area ETF
6 could include:

- 7 • Secondary waste powder generated from the treatment process
- 8 • Aqueous waste received from other Hanford site sources awaiting treatment
- 9 • Miscellaneous waste generated by operations and maintenance activities.

10 The secondary treatment train processes the waste by-products from the primary treatment train, which
11 are concentrated and dried into a powder. Containers are filled with dry powder waste from the thin film
12 dryer via a remotely controlled system. Containers of aqueous waste received from other Hanford site
13 sources are stored at 200 Area ETF until their contents can be transferred to the process for treatment.
14 The waste is usually transferred to the secondary waste receiving or concentration tanks. Miscellaneous
15 waste generated from maintenance and operations activities are stored at the ETF. The waste could
16 include process waste, such as used filter elements; spent RO membranes; damaged equipment, and
17 decontamination and maintenance waste, such as contaminated rags, gloves, and other personal protective
18 equipment. Containers of miscellaneous waste which have free liquids generally are packaged with
19 absorbents.

20 Several container collection areas could be located within the 200 Area ETF process and container
21 handling areas. These collection areas are used only to accumulate waste in containers. Once a container
22 is filled, the container is transferred to a container storage area (Figure C.3 and Figure C.4), to another
23 TSD unit, or to a less-than-90-day storage pad. Containers stored in the additional storage area
24 (Figure C.4) are elevated or otherwise protected from contact with accumulated liquids. The container
25 storage area within 200 Area ETF is a 22.9 x 8.5-meter room located adjacent to the 200 Area ETF
26 process areas. The containers within the container storage area are clearly labeled, and access to these
27 containers is limited by barriers and by administrative controls. The 200 Area ETF floor provides
28 secondary containment, and the 200 Area ETF roof and walls protects all containers from exposure to the
29 elements.

30 Waste also could be placed in containers for treatment as indicated in Addendum A. For example, sludge
31 that accumulates in the bottoms of the process tanks is removed periodically and placed into containers.
32 In this example, the waste is solidified by decanting the supernate from the container and the remainder of
33 the waste is allowed to evaporate, or absorbents are added, as necessary, to address remaining liquids.
34 Following treatment, this waste either is stored at the 200 Area ETF or transferred to another TSD unit.

35 **C.3.1 Description of Containers**

36 The containers used to collect and store dry powder waste are 208-liter steel containers. Most of the
37 aqueous waste received at 200 Area ETF, and maintenance and operation waste generated, are stored in
38 208-liter steel or plastic containers; however, in a few cases, the size of the container could vary to
39 accommodate the size of a particular waste. For example, some process waste, such as spent filters,
40 might not fit into a 208-liter container. In the case of spent resin from the IX columns, the resin is
41 dewatered, and could be packaged in a special disposal container. In these few cases, specially sized
42 containers could be required. In all cases, however, only approved containers are used and are compatible
43 with the associated waste. Typically, 208-liter containers are used for treatment.

44 Current operating practices indicate the use of new 208-liter containers that have either a polyethylene
45 liner or a protective coating. Any reused or reconditioned container is inspected for container integrity
46 before use. Overpack containers are available for use with damaged containers. Overpack containers
47 typically are unlined steel or polyethylene.

1 Per Addendum A, a maximum of 147,630 liters of dangerous and/or mixed waste could be stored in
2 containers in the 200 Area ETF.

3 **C.3.2 Container Management Practices**

4 Before use, each container is checked for signs of damage such as dents, distortion, corrosion, or
5 scratched coating. For dry powder loading, empty containers on pallets are raised by a forklift and
6 manually placed on the conveyor that transports the containers to the automatic filling station in the
7 container handling room (Figure C.14). The container lids are removed and replaced manually following
8 the filling sequence. After filling, containers exit the container handling room via the filled drum
9 conveyor. Locking rings are installed, the container label is affixed, and the container is moved by dolly
10 or forklift to the container storage area.

11 Before receipt at 200 Area ETF, each container from other Hanford site sources is inspected for leaks,
12 signs of damage, and a loose lid. The identification number on each container is checked to ensure the
13 proper container is received. The containers are typically placed on pallets and moved by dolly or forklift
14 to the container storage area. These containers are later moved to the process area and the contents
15 transferred to the process for treatment.

16 Containers used for storing maintenance and operations secondary waste are labeled before being placed
17 in the container storage area or in a collection area. Lids are secured on these containers when not being
18 filled. When the containers in a collection area are full, the containers are transferred by dolly or forklift
19 to the container storage area or to an appropriate TSD unit. Containers used for treating waste also are
20 labeled. The lids on these containers are removed as required to allow for treatment. During treatment,
21 access to these containers is controlled through physical barriers and/or administrative controls.

22 The filled containers in the container storage area are inventoried, checked for proper labeling, and placed
23 on pallets or in a separate containment device as necessary. Each pallet is moved by forklift. Within the
24 container storage area, palletized containers are stacked no more than three pallets high and in rows no
25 more than two containers wide. Unobstructed aisles with a minimum of 76-centimeter aisle space
26 separate rows.

27 **C.3.3 Container Labeling**

28 Labels are affixed on containers used to store dry powder when the containers leave the container
29 handling room. Labels are affixed on other waste containers before use. Every container is labeled with
30 the date that the container was filled. Appropriate major risk labels, such as "corrosive", "toxic", or
31 "F-listed", also are added. Each container also has a label with an identification number for tracking
32 purposes.

33 **C.3.4 Containment Requirements for Managing Containers**

34 Secondary containment is provided in the container management areas within the ETF. The secondary
35 containment provided for tank systems also serves the container management areas. This section
36 describes the design and operation of the secondary containment structure for these areas.

37 **C.3.4.1 Secondary Containment System Design**

38 For the container management areas, the reinforced concrete floor and a 15.2-centimeter rise (berm) along
39 the walls of the container storage area of the 200 Area ETF provides secondary containment. The
40 engineering assessment required for tanks (Mausshardt 1995) also describes the design and construction
41 of the secondary containment provided for the 200 Area ETF container management areas. All systems
42 were designed to national codes and standards (e.g., American Society for Testing Materials, American
43 Concrete Institute standards).

44 The floor is composed of cast-in-place, pre-formed concrete slabs, and has a minimum thickness of 15.2
45 centimeters. All slab joints and floor and wall joints have water stops installed at the mid-depth of the
46 slab. In addition, filler was applied to each joint. The floor and berms are coated with a chemically
47 resistant; high-solids epoxy coating system consisting of primer and top coating. This coating material is

1 compatible with the waste managed in containers and is an integral part of the secondary containment
2 system for containers.

3 The floor is sloped to drain any solution in the container storage area to floor drains along the west wall.
4 Each floor drain consists of a grating over a 20.3-centimeter diameter drain port connected to a 4-inch
5 polyvinyl chloride transfer pipe. The pipe passes under this wall and connects to a trench running along
6 the east wall of the adjacent process area. This trench drains solution to sump tank 1.

7 The container storage area is separated from the process area by a common wall and a door for access to
8 the two areas (Figure C.3). These two areas also share a common floor and trenches that, with the
9 15.2-centimeter rise of the containing walls, form the secondary containment system for the process area
10 and the container storage area.

11 **C.3.4.2 Structural Integrity of Base**

12 Engineering calculations were performed showing the floor of the container storage area is capable of
13 supporting the weight of containers. These calculations were reviewed and certified by a professional
14 engineer (Mausshardt 1995). The concrete was inspected for damage during construction. Cracks were
15 identified and repaired to the satisfaction of the professional engineer. Documentation of these
16 certifications is included in the engineering assessment (Mausshardt 1995).

17 **C.3.4.3 Containment System Capacity**

18 The container storage area is primarily used to store dry powder, aqueous waste awaiting treatment, and
19 maintenance and operation waste. Where appropriate, absorbents are added to fix any trace liquids
20 present. Large volumes of liquid are not stored in the container storage area. However, liquids might be
21 present in those containers that are in the treatment process. The maximum volume of waste that can be
22 stored in containers in the container storage area is 147,630 liters.

23 Because they are interconnected by floor drains, both the process area and the container storage area are
24 considered in the containment system capacity. The volume available for secondary containment in the
25 process area is approximately 68,000 liters, as discussed in the engineering assessment (Mausshardt
26 1995). Using the dimensions of the container storage area (23.6 by 8.5 by 0.2 meters), and assuming that
27 50 percent of the floor area is occupied by containers, the volume of the container storage area is
28 15,300 liters. The container handling area also provides 10,500 liters of containment as it is connected to
29 the other two areas. The combined volume of the container storage area and process area, and container
30 handling area available for secondary containment, is 93,800 liters. This volume is greater than
31 10 percent of the maximum total volume of containers allowed for storage in the ETF, as discussed
32 previously.

33 **C.3.4.4 Control of Run-on**

34 The container management areas are located within the ETF, which serves to prevent run-on of
35 precipitation.

36 **C.3.4.5 Removal of Liquids from Containment Systems**

37 The container storage area is equipped with drains that route solution to a trench in the process area,
38 which drains to sump tank 1. The sump tanks are equipped with alarms that notify operating personnel
39 that a leak is occurring. The sump tanks also are equipped with pumps to transfer waste to the surge tank
40 or the secondary treatment train.

41 **C.3.4.6 Prevention of Ignitable, Reactive, and Incompatible Wastes in Containers**

42 Individual waste types (i.e., ignitable, corrosive, and reactive) are stored in separate containers. A waste
43 that could be incompatible with other wastes is separated and protected from the incompatible waste.
44 Incompatible wastes are evaluated using the methodology documented in [40 CFR 264](#), Appendix V. For
45 example, acidic and caustic wastes are stored in separate containers. Free liquids are absorbed in
46 miscellaneous waste containers that hold incompatible waste. Additionally, ETF-specific packaging

1 requirements for these types of waste provide extra containment with each individual container. For
2 example, each item of acidic waste is individually bagged and sealed within a lined container.

3 **C.4 TANK SYSTEMS**

4 This section provides specific information on tank systems and process units. This section also includes a
5 discussion on the types of waste to be managed in the tanks, tank design information, integrity
6 assessments, and additional information on the 200 Area ETF tanks that treat and store dangerous and/or
7 mixed waste. The 200 Area ETF dangerous waste tanks are identified in Section 4C.4.1.1, and the
8 relative locations of the tanks and process units in the 200 Area ETF are presented in Figure C.3.

9 **C.4.1 Design Requirements**

10 The following sections provide an overview of the design specifications for the tanks within the ETF. A
11 separate discussion on the design of the process units also is provided. In accordance with the new tank
12 system requirements of [WAC 173-303-640\(3\)](#), the following tank components and specifications were
13 assessed:

- 14 • Dimensions, capacities, wall thicknesses, and pipe connections
- 15 • Materials of construction and linings and compatibility of materials with the waste being processed
- 16 • Materials of construction of foundations and structural supports
- 17 • Review of design codes and standards used in construction
- 18 • Review of structural design calculations, including seismic design basis
- 19 • Waste characteristics and the effects of waste on corrosion

20 This assessment was documented in the *Final RCRA Information Needs Report* (Mausshardt 1995; the
21 engineering assessment performed for the 200 Area ETF tank systems by an independent professional
22 engineer. A similar assessment of design requirements was performed for Load-in tanks 59A-TK-109
23 and -117 and is documented in *200 Area Effluent BAT/AKART Implementation, ETF Truck Load-in*
24 *Facility, Project W-291H Integrity Assessment Report* (KEH 1994). An assessment was also performed
25 when Load-in tank 59A-TK-1 was placed into service for receipt of dangerous and mixed wastes. The
26 assessment is documented in *200 Area ETF Purgewater Unloading Facility Tank System Integrity*
27 *Assessment* (HNF 2009a).

28 The specifications for the preparation, design, and construction of the tank systems at the 200 Area ETF
29 are documented in the *Design Construction Specification, Project C-018H, 242-A Evaporator/PUREX*
30 *Plant Process Condensate Treatment Facility* (WHC 1992a). The preparation, design, and construction
31 of Load-in tanks 59A-TK-109 and -117 are provided in the construction specifications in *Project W-291,*
32 *200 Area Effluent BAT/AKART Implementation ETF Truck Load-in Facility* (KEH 1994). The
33 preparation, design and construction of Load-in 59A-TK-1 are documented in *Purgewater Unloading*
34 *Facility Project Documentation* (HNF 2009b).

35 Most of the tanks in the 200 Area ETF are constructed of stainless steel. According to the design of the
36 ETF, it was determined stainless steel would provide adequate corrosion protection for these tanks.
37 Exceptions include Load-in tank 59A-TK-1, which is constructed of fiberglass-reinforced plastic and the
38 verification tanks, which are constructed of carbon steel with an epoxy coating. The 200 Area ETF
39 evaporator/vapor body (and the internal surfaces of the thin film dryer) is constructed of a corrosion
40 resistant alloy, known as alloy 625, to address the specific corrosion concerns in the secondary treatment
41 train. Finally, the hydrogen peroxide decomposer vessels are constructed of carbon steel and coated with
42 a vinyl ester lining.

43 The shell thicknesses of the tanks identified in Table C.5 represent a nominal thickness of a new tank
44 when placed into operation. The tank capacities identified in this table represent the maximum volumes.
45 Nominal tank volumes discussed below represent the maximum volume in a tank unit during normal
46 operations.

1 **C.4.1.1 Codes and Standards for Tank System Construction**

2 Specific standards for the manufacture of tanks and process systems installed in the 200 Area ETF are
3 briefly discussed in the following sections. In addition to these codes and industrial standards, a seismic
4 analysis for each tank and process system is required [[WAC 173-303-806\(4\)\(a\)\(xi\)](#)]. The seismic
5 analysis was performed in accordance with UCRL-15910 *Design and Evaluation Guidelines for*
6 *Department of Energy Facilities Subjected to Natural Phenomena Hazards*, Section 4 (UCRL 1987).
7 The results of the seismic analyses are summarized in the engineering assessment of the 200 Area ETF
8 tank systems (Mausshardt 1995).

9 **Storage and Treatment Tanks.** The following tanks store and/or treat dangerous waste at the ETF.

| 10 <u>Tank name</u> | <u>Tank number</u> |
|--|-------------------------|
| 11 Surge tank | 2025E-60A-TK-1 |
| 12 pH adjustment tank | 2025E-60C-TK-1 |
| 13 Effluent pH adjustment tank | 2025E-60C-TK-2 |
| 14 First RO feed tank | 2025E-60F-TK-1 |
| 15 Second RO feed tank | 2025E-60F-TK-2 |
| 16 Verification tanks (three) | 2025E-60H-TK-1A/1B/1C |
| 17 Secondary waste receiving tanks (two) | 2025E-60I-TK-1A/1B |
| 18 Evaporator (vapor body) | 2025E-601-EV-1 |
| 19 Concentrate tanks (two) | 2025E-60J-TK-1A/1B |
| 20 Sump tanks (two) | 2025E-20B-TK-1/2 |
| 21 Distillate flash tank | 2025E-60I-TK-2 |
| 22 Load-in tanks | 2025ED-59A-TK-1/109/117 |

23 The relative location of these tanks is presented in Figure C.3. These tanks are maintained at or near
24 atmospheric pressure. The codes and standards applicable to the design, construction, and testing of the
25 above tanks and ancillary piping systems are as follows:

- 26 ASME - B31.3 Chemical Plant and Petroleum Refinery Piping (ASME 1990)
- 27 ASME Sect. VIII, Division I Pressure Vessels (ASME 1992a)
- 28 AWS - D1.1 Structural Welding Code - Steel (AWS 1992)
- 29 ANSI - B16.5 Pipe Flanges and Flanged Fittings (ANSI 1992)
- 30 ASME Sect. IX Welding and Brazing Qualifications (ASME 1992b)
- 31 API 620 Design and Construction of Large Welded Low Pressure Storage Tanks (API 1990)
- 32 AWWA - D100 Welded Steel Tanks for Water Storage (AWWA 1989)
- 33 AWWA - D103 Factory-Coated Bolted Steel Tanks for Water Storage (AWWA 1987)
- 34 AWWA - D120 Thermosetting Fiberglass-Reinforced Plastic Tanks (AWWA 1984)
- 35 ASTM-D3299 Filament Wound Glass-Fiber-Reinforced Thermoset Resin Corrosion Resistant Tanks.

36

37 The application of these standards to the construction of 200 Area ETF tanks and independent verification
38 of completed systems ensured that the tank and tank supports had sufficient structural strength and that
39 seams and connections were adequate to ensure tank integrity. In addition, each tank met strict quality
40 assurance requirements. Each tank constructed offsite was tested for integrity and leak tightness before
41 shipment to the Hanford Facility. Following installation, the systems were inspected for damage to
42 ensure against leakage and to verify proper operation. If a tank was damaged during shipment or
43 installation, leak tightness testing was repeated onsite.

1 **C.4.1.2 Design Information for Tanks Located Outside of Effluent Treatment Facility**

2 The load-in tanks, surge tank, and verification tanks are located outside the ETF. These tanks are located
3 within concrete structures that provide secondary containment.

4 **Load-In Tanks and Ancillary Equipment.** The load-in tanks 59A-TK-109 and -117 are heated and
5 constructed of stainless steel, and have a nominal capacity of 31,000 liters. Load-in tank 59A-TK-1 is
6 heated and constructed of fiberglass reinforced plastic and has a nominal capacity of 24,500 liters. Load-
7 in tanks 59A-TK-109 and -117 are located outside of the metal building while Load-in tank 59A-TK-1 is
8 located inside the building. Ancillary equipment includes transfer pumps, filtration systems, a double
9 encased, fiberglass transfer pipeline, level instruments for tanker trucks, and leak detection equipment.
10 From the Load-In Station, aqueous waste can be routed to the surge tank or to the LERF through a
11 double-encased line. The load-in tanks, sump, pumps, and truck pad are all provided with secondary
12 containment.

13 **Surge Tank and Ancillary Equipment.** The surge tank is constructed of stainless steel and has a
14 nominal capacity of 421,000 liters. Ancillary equipment to the surge tank includes two underground
15 double encased (i.e., pipe-within-a-pipe) transfer lines connecting to LERF and three pumps for
16 transferring aqueous waste to the primary treatment train. The surge tank is located at the south end of
17 the ETF. The surge tank is insulated and the contents heated to prevent freezing. Eductors in the tank
18 provide mixing.

19 **Verification Tanks and Ancillary Equipment.** The verification tanks are located north of the ETF.
20 The verification tanks have a nominal capacity of 2,760,000 liters each. For support, the tanks have a
21 center post with a webbing of beams that extend from the center post to the sides of the tank. The roof is
22 constructed of epoxy covered carbon steel that is attached to the cross beams of the webbing. The tank
23 floor also is constructed of epoxy covered carbon steel and is sloped. Eductors are installed in each tank
24 to provide mixing.

25 Ancillary equipment includes a return pump that provides circulation of treated effluent through the
26 eductors. The return pump also recycles effluent back to the 200 Area ETF for retreatment and can
27 provide service water for 200 Area ETF functions. Two transfer pumps are used to discharge treated
28 effluent to SALDS or back to the LERF.

29 **C.4.1.3 Design Information for Tanks Located Inside the Effluent Treatment Facility** 30 **Building**

31 Most of the 200 Area ETF tanks and ancillary equipment that store or treat dangerous and/or mixed waste
32 are located within the ETF. The structure serves as secondary containment for the tank systems.

33 **pH Adjustment Tank and Ancillary Equipment.** The pH adjustment tank has a nominal capacity of
34 16,000 liters. Ancillary equipment for this tank includes overflow lines to a sump tank and pumps to
35 transfer waste to other units in the main treatment train.

36 **Effluent pH Adjustment Tank and Ancillary Equipment.** The effluent pH adjustment tank has a
37 nominal capacity of 13,700 liters. Ancillary equipment includes overflow lines to a sump tank and pumps
38 to transfer waste to the verification tanks.

39 **First and Second Reverse Osmosis Feed Tanks and Ancillary Equipment.** The first RO feed tank is a
40 vertical, stainless steel tank with a round bottom and has a nominal capacity of 19,700 liters. Conversely,
41 the second RO feed tank is a rectangular vessel with the bottom of the tank sloping sharply to a single
42 outlet in the bottom center. The second RO feed tank has a nominal capacity of 7,800 liters. Each RO
43 tank has a pump to transfer waste to the RO arrays. Overflow lines are routed to a sump tank.

44 **Secondary Waste Receiving Tanks and Ancillary Equipment.** Two nominal 69,000-liter secondary
45 waste receiving tanks collect waste from the units in the main treatment train, such as concentrate solution
46 (retentate) from the RO units and regeneration solution from the IX columns. These are vertical,

1 cylindrical tanks with a semi-elliptical bottom and a flat top. Ancillary equipment includes overflow lines
2 to a sump tank and pumps to transfer aqueous waste to the 200 Area ETF evaporator.

3 **Effluent Treatment Facility Evaporator and Ancillary Equipment.** The 200 Area ETF evaporator,
4 the principal component of the evaporation process, is a cylindrical pressure vessel with a conical bottom.
5 Aqueous waste is fed into the lower portion of the vessel. The top of the vessel is domed and the vapor
6 outlet is configured to prevent carryover of liquid during the foaming or bumping (violent boiling) at the
7 liquid surface. The 200 Area ETF evaporator has a nominal operating capacity of approximately
8 18,500 liters.

9 The 200 Area ETF evaporator includes the following ancillary equipment:

- 10 • Preheater
- 11 • Recirculation pump
- 12 • Waste heater with steam level control tank
- 13 • Concentrate transfer pump
- 14 • Entrainment separator
- 15 • Vapor compressor with silencers
- 16 • Silencer drain pump.

17 **Distillate Flash Tank and Ancillary Equipment.** The distillate flash tank is a horizontal tank that has a
18 nominal operating capacity of 780 liters. Ancillary equipment includes a pump to transfer the distillate to
19 the surge tank for reprocessing.

20 **Concentrate Tanks and Ancillary Equipment.** Each of the two concentrate tanks has an approximate
21 nominal capacity of 22,700 liters. Ancillary equipment includes overflow lines to a sump tank and pumps
22 for recirculation and transfer.

23 **Sump Tanks.** Sump tanks 1 and 2 are located below floor level. Both sump tanks are double-walled,
24 rectangular tanks, placed inside concrete vaults. Both tanks have a working volume of 4,000 liters each.
25 The sump tanks are located in pits below grade to allow gravity drain of solutions to the tanks. Each
26 sump tank has two vertical pumps for transfer of waste to the secondary waste receiving tanks or to the
27 surge tank for reprocessing.

28 **C.4.1.4 Design Information for Effluent Treatment Facility Process Units**

29 As with the 200 Area ETF tanks, process units that treat and/or store dangerous and/or mixed waste are
30 maintained at or near atmospheric pressure. These units were constructed to meet a series of design
31 standards, as discussed in the following sections. Table C.6 presents the materials of construction and the
32 ancillary equipment associated with these process units. All piping systems are designed to withstand the
33 effects of internal pressure, weight, thermal expansion and contraction, and any pulsating flow. The
34 design and integrity of these units are presented in the engineering assessment (Mausshardt 1995).

35 **Filters.** The load-in fine and rough filter vessels (including the influent and auxiliary filters) are designed
36 to comply with the ASME Section VIII, Division I, Pressure Vessels (ASME 1992a). The application of
37 these standards to the construction of the 200 Area ETF filter system and independent inspection ensure
38 that the filter and filter supports have sufficient structural strength and that the seams and connections are
39 adequate to ensure the integrity of the filter vessels.

40 **Ultraviolet Oxidation System.** The UV/OX reaction chamber is designed to comply with manufacturers
41 standards.

42 **Degasification System.** The codes and standards applicable to the design, fabrication, and testing of the
43 degasification column are identified as follows:

- 44 • ASME - B31.3, Chemical Plant and Petroleum Refinery Piping (ASME 1990)
- 45 • AWS - D1.1, Structural Welding Code - Steel (AWS 1992)
- 46 • ANSI - B16.5, Pipe Flanges and Flanged Fittings (ANSI 1992)

1 **Reverse Osmosis System.** The pressure vessels in the RO unit are designed to comply with ASME
2 Section VIII, Division I, Pressure Vessels (ASME 1992a), and applicable codes and standards.

3 **Ion Exchange (Polishers).** The IX columns are designed in accordance with ASME Section VIII,
4 Division I, Pressure Vessels (ASME 1992a), and applicable codes and standards. Polisher piping is
5 fabricated of type 304 stainless steel or polyvinyl chloride (PVC) and meets the requirements of
6 ASME B31.3, Chemical Plant and Petroleum Refinery Piping (ASME 1990).

7 **Effluent Treatment Facility Evaporator.** The 200 Area ETF evaporator is designed to meet the
8 requirements of ASME Section VIII, Division I, Pressure Vessels (ASME 1992a), and applicable codes
9 and standards. The 200 Area ETF evaporator piping meets the requirements of ASME B31.3, Chemical
10 Plant and Petroleum Refinery Piping (ASME 1990).

11 **Thin Film Dryer System.** The thin film dryer is designed to meet the requirements of ASME
12 Section VIII, Division I, Pressure Vessels (ASME 1992a), and applicable codes and standards. The
13 piping meets the requirements of ASME - B31.3, Chemical Plant and Petroleum Refinery Piping
14 (ASME 1990).

15 **C.4.1.5 Integrity Assessments.**

16 The integrity assessment for 200 Area ETF (Mausshardt 1995) attests to the adequacy of design and
17 integrity of the tanks and ancillary equipment to ensure that the tanks and ancillary equipment will not
18 collapse, rupture, or fail over the intended life considering intended uses. For the load-in tanks, a similar
19 integrity assessment was performed (KEH 1995 and HNF 2009a). Specifically, the assessment
20 documents the following considerations:

- 21 • Adequacy of the standards used during design and construction of the facility
- 22 • Characteristics of the solution in each tank
- 23 • Adequacy of the materials of construction to provide corrosion protection from the solution in each
24 tank
- 25 • Results of the leak tests and visual inspections

26 The results of these assessments demonstrate that tanks and ancillary equipment have sufficient structural
27 integrity and are acceptable for storing and treating dangerous and/or mixed waste. The assessments also
28 state that the tanks and building were designed and constructed to withstand a design-basis earthquake.
29 Independent, qualified registered professional engineers certified these tank assessments.

30 The scope of the 200 Area ETF tank integrity assessment was based on characterization data from process
31 condensate. To assess the effect that other aqueous waste might have on the integrity of the 200 Area
32 ETF tanks, the chemistry of an aqueous waste will be evaluated for its potential to corrode a tank (e.g.,
33 chloride concentrations will be evaluated). The tank integrity assessment for the load-in tanks was based
34 on characterization data from several aqueous waste streams. The chemistry of an aqueous waste stream
35 not considered in the load-in tank integrity assessment also will be evaluated for the potential to corrode a
36 load-in tank.

37 Consistent with the recommendations of the integrity assessment, a corrosion inspection program was
38 developed. Periodic integrity assessments are scheduled for those tanks predicted to have the highest
39 potential for corrosion. These inspections are scheduled annually or longer, based on age of the tank
40 system, materials of construction, characteristics of the waste, operating experience, and
41 recommendations of the initial integrity assessment. These 'indicator tanks' include the concentrate
42 tanks, secondary waste receiving tanks, and verification tanks. One of each of these tanks will be
43 inspected yearly to determine if corrosion or coating failure has occurred. Should significant corrosion or
44 coating failure be found, an additional tank of the same type would be inspected during the same year. In
45 the case of the verification tanks, if corrosion or coating failure is found in the second tank, the third tank
46 also will be inspected. If significant corrosion were observed in all three sets of tanks, the balance of the

1 200 Area ETF tanks would be considered for inspection. For tanks predicted to have lower potential for
2 corrosion, inspections also are performed nonroutinely as part of the corrective maintenance program.

3 **C.4.2 Additional Requirements for New Tanks**

4 Procedures for proper installation of tanks, tank supports, piping, concrete, etc., are included in
5 *Construction Specification, Project C-018H, 242-A Evaporator/PUREX Plant Process Condensate*
6 *Treatment Facility* (WHC 1992a). For the load-in tanks, procedures are included in the construction
7 specifications in *Project W-291, 200 Area Effluent BAT/AKART Implementation ETF Truck Load-in*
8 *Facility* (KEH 1994) and *Purgewater Unloading Facility Project Documentation* (HNF 2009b).
9 Following installation, an independent, qualified, registered professional engineer inspected the tanks and
10 secondary containment. Deficiencies identified included damage to the surge tank, damage to the
11 verification tank liners, and 200 Area ETF secondary containment concrete surface cracking. All
12 deficiencies were repaired to the satisfaction of the engineer. The tanks and ancillary equipment were
13 leak tested as part of acceptance of the system from the construction contractor. Information on the
14 inspections and leak tests are included in the engineering assessment (Mausshardt 1995). No deficiencies
15 were identified during installation of the load-in tanks and ancillary equipment.

16 **C.4.3 Secondary Containment and Release Detection for Tank Systems**

17 This section describes the design and operation of secondary containment and leak detection systems at
18 the ETF.

19 **C.4.3.1 Secondary Containment Requirements for All Tank Systems**

20 The specifications for the preparation, design, and construction of the secondary containment systems at
21 the 200 Area ETF are documented (WHC 1992a). The preparation, design, and construction of the
22 secondary containment for the load-in tanks are provided in the construction specifications (KEH 1994
23 and HNF 2009b). All systems were designed to national codes and standards. Constructing the 200 Area
24 ETF per these specifications ensured that foundations are capable of supporting tank and secondary
25 containment systems and that uneven settling and failures from pressure gradients should not occur.

26 **C.4.3.1.1 Common Elements**

27 The following text describes elements of secondary containment that are common to all 200 Area ETF
28 tank systems. Details on the secondary containment for specific tanks, including leak detection systems
29 and liquids removal, are provided in Section 4C.4.4.1.2.

30 **Foundation and Construction.** For the tanks within the ETF, except for the sump tanks, secondary
31 containment is provided by a coated concrete floor and a 15.2-centimeter rise (berm) along the containing
32 walls. The double-wall construction of the sump tanks provides secondary containment. Additionally,
33 trenches are provided in the floor that also provides containment and drainage of any liquid to a sump pit.
34 For tanks outside the ETF, secondary containment also is provided with coated concrete floors in a
35 containment pit (load-in tanks) or surrounded by concrete dikes (the surge and verification tanks).

36 The transfer piping that carries aqueous waste into the 200 Area ETF is pipe-within-a-pipe construction,
37 and is buried approximately 1.2 meters below ground surface. The pipes between the verification tanks
38 and the verification tank pumps within the 200 Area ETF are located in a concrete pipe trench.

39 For this discussion, there are five discrete secondary containment systems associated with the following
40 tanks and ancillary equipment that treat or store dangerous waste:

- 41 • Load-in tanks
- 42 • Surge tank
- 43 • Process area (including sump tanks)
- 44 • Verification tanks
- 45 • Transfer piping and pipe trenches

1 All of the secondary containment systems are designed with reinforcing steel and base and berm thickness
2 to minimize failure caused by pressure gradients, physical contact with the waste, and climatic conditions.
3 Classical theories of structural analysis, soil mechanics, and concrete and structural steel design were used
4 in the design calculations for the foundations and structures. These calculations are maintained at the
5 ETF. In each of the analyses, the major design criteria from the following documents were included:

| | |
|-------------------|--|
| V-C018HC1-001 | Design Construction Specification, Project C-018H, 242A Evaporator/PUREX Plant Process Condensate Treatment Facility (WHC 1992a) |
| DOE Order 6430.1A | General Design Criteria |
| SDC-4.1 | Standard Architectural-Civil Design Criteria, Design Loads for Facilities (DOE-RL 1988) |
| UCRL-15910 | Design and Evaluation Guidelines for Department of Energy Facilities Subjected to Natural Phenomena Hazards (UCRL 1987) |
| UBC-91 | Uniform Building Code, 1991 Edition (ICBO 1991) |
| UBC-97 | Uniform Building Code, 1997 Edition (ICC 1997, for Load-in tank 59A-TK-1) |

6 The design and structural analysis calculations substantiate the structural designs in the referenced
7 drawings. The conclusions drawn from these calculations indicate that the designs are sound and that the
8 specified structural design criteria were met. This conclusion is verified in the independent design review
9 that was part of the engineering assessment (Mausshardt 1995, KEH 1994, and HNF 2009a).

10 **Containment Materials.** The concrete floor consists of cast-in-place and preformed concrete slabs. All
11 slab joints and floor and wall joints have water stops installed at the mid-depth of the slab. In addition,
12 filler was applied to each joint.

13 Except for the sump tank vaults, all of the concrete surfaces in the secondary containment system,
14 including berms, trenches, and pits, are coated with a chemical-resistant, high-solids, epoxy coating that
15 consists of a primer and a top coating. This coating material is compatible with the waste being treated,
16 and with the sulfuric acid, sodium hydroxide, and hydrogen peroxide additives to the process. The
17 coating protects the concrete from contact with any chemical materials that might be harmful to concrete
18 and prevents the concrete from being in contact with waste material. Table C.8 summarizes the specific
19 types of primer and top coats specified for the concrete and masonry surfaces in the ETF. The epoxy
20 coating is considered integral to the secondary containment system for the tanks and ancillary equipment.

21 The concrete containment systems are maintained such that any cracks, gaps, holes, and other
22 imperfections are repaired in a timely manner. Thus, the concrete containment systems do not allow
23 spilled liquid to reach soil or groundwater. There are a number of personnel doorways and vehicle access
24 points into the 200 Area ETF process areas. Releases of any spilled or leaked material to the environment
25 from these access points are prevented by 15.2-centimeter concrete curbs, sloped areas of the floor
26 (e.g., truck ramp), or trenches.

27 **Containment Capacity and Maintenance.** Each of these containment areas is designed to contain more
28 than 100 percent of the volume of the largest tank in each respective system. Secondary containment
29 systems for the surge tank, and the verification tanks, which are outside the ETF, also are large enough to
30 include the additional volume from a 25-year, 24-hour storm event; i.e., 5.3 centimeters of precipitation.

31 **Sprinkler System.** The sprinkler system within the 200 Area ETF supplies firewater protection to the
32 process area and the container storage area. This system is connected to a site wide water supply system
33 and has the capacity to supply sufficient water to suppress a fire at the ETF. However, in the event of
34 failure, the sprinkler system can be hooked up to another water source (e.g., tanker truck).

35 **C.4.3.1.2 Specific Containment Systems**

36 The following discussion presents a description of the individual containment systems associated with
37 specific tank systems.

1 **Load-In Tank Secondary Containment.** The load-in tanks 59A-TK-109 and -117 are mounted on a 46-
2 centimeter-thick reinforced concrete slab (Drawing H-2-817970). Secondary containment is provided by
3 a pit with 30.5-centimeter-thick walls and a floor constructed of reinforced concrete. The load-in tank pit
4 is sloped to drain solution to a sump. The depth of the pit varies with the slope of the floor, with an
5 average thickness of about 1.1 meters. The volume of the secondary containment is about 73,000 liters,
6 which is capable of containing the volume of at least one load-in tank (i.e., 34,200 liters). Leaks are
7 detected by a leak detector that alarms locally, in the 200 Area ETF control room, and by visual
8 inspection of the secondary containment.

9 Adjacent to the pit is a 25.4-centimeter-thick reinforced concrete pad that serves as secondary
10 containment for the load-in tanker trucks, containers, transfer pumps, and filter system that serve as the
11 first tanker truck unloading bay. The pad is inside the metal Load-in building and is 15.2 centimeters
12 below grade with north and south walls gently sloped to allow truck access. The pad has a 3-inch drain
13 pipe to route waste solution to the adjacent load-in tank pit. The pad does not have protective coating
14 because it would experience excessive wear from the vehicle traffic.

15 Load-in tank 59A-TK-1 is located on a 25.4-centimeter-thick reinforced concrete slab (Drawing H-2-
16 817970) inside the metal Load-in building. The tank has a flat bottom which sits on a concrete slab in the
17 secondary containment. Secondary containment for the tank, filter system, and truck unloading piping is
18 provided by an epoxy coated catch basin with a capacity of about 3,400 liters. The catch basin is sloped
19 to route solution from the catch basin through a 15.2-centimeter-wide by 14.3-centimeter-deep trench to
20 the adjacent truck unloading pad. This pad drains to the Load-in tank pit discussed above. The volume of
21 the combined secondary containment of these two systems is greater than 76,400 liters, which is capable of
22 holding the volume of tank 59A-TK-1 (i.e., 26,000 liters).

23 Adjacent to tank 59A-TK-1 catch basin is a 25.4-centimeter-thick reinforced concrete pad that serves as
24 the second tanker truck unloading bay. The pad is inside the metal Load-in building and has a 2.4-meter
25 by 4.0-meter shallow, sloping pit to catch leaks during tanker truck unloading. The pit has a maximum
26 depth of 6.0 centimeters and a 15.2-centimeter-wide by 6.0-centimeter-deep trench to route leaks to the
27 adjacent tank 59A-TK-1 catch basin. The pad does not have protective coating because it would
28 experience excessive wear from the vehicle traffic.

29 **Surge Tank Secondary Containment.** The surge tank is mounted on a reinforced concrete ringwall.
30 Inside the ringwall, the flat-bottomed tank is supported by a bed of compacted sand and gravel with a
31 high-density polyethylene liner bonded to the ringwall. The liner prevents galvanic corrosion between the
32 soil and the tank. The secondary containment is reinforced concrete with a 15.2-centimeter thick floor
33 and a 20.3-centimeter thick dike. The secondary containment area shares part of the southern wall of the
34 main process area. The dike extends up 2.9 meters to provide a containment volume of 856,000 liters for
35 the 462,000-liter surge tank.

36 The floor of the secondary containment slopes to a sump in the northwest corner of the containment area.
37 Leaks into the secondary containment are detected by level instrumentation in the sump, which alarms in
38 the 200 Area ETF control room, and/or by routine visual inspections. A sump pump is used to transfer
39 solution in the secondary containment to a sump tank.

40 **Process Area Secondary Containment.** The process area contains the tanks and ancillary equipment of
41 the primary and secondary treatment trains, and has a jointed, reinforced concrete slab floor. The
42 concrete floor of the process area provides the secondary containment. This floor is a minimum of
43 15.2 centimeters thick. With doorsills 15.2 centimeter high, the process area has a containment volume of
44 approximately 93,800 liters. The largest tanks in the process area are the secondary waste receiving
45 tanks, which each have a maximum capacity of 73,800 liters.

46 The floor of the process area is sloped to drain liquids to two trenches that drain to a sump. Each trench is
47 approximately 38.1 centimeters wide with a sloped trough varying from 39.4 to 76.2 centimeters deep.
48 Leaks into the secondary containment are detected by routine visual inspections of the floor area near the
49 tanks, ancillary equipment, and in the trenches.

1 A small dam was placed in the trench that comes from the thin film dryer room to contain minor liquid
2 spills originating in the dryer room to minimize the spread of contamination into the process area. The
3 dryer room is inspected for leaks in accordance with the inspection schedule in Addendum I. Operators
4 clean up these minor spills by removing the liquid waste and decontaminating the spill area.

5 A small dam was also placed in the trench adjacent to the chemical feed skid when the chemical berm
6 area was expanded to accommodate acid and caustic pumps, which were moved indoors from the top of
7 the surge tank to resolve a safety concern. This dam was designed to contain minor spills originating in
8 the chemical berm area and prevent them from entering the process sump.

9 The northwest corner of the process area consists of a pump pit containing the pumps and piping for
10 transferring treated effluent from the verification tanks to SALDS. The pit is built 1.37 meters below the
11 process area floor level and is sloped to drain to a trench built along its north wall that routes liquid to
12 sump tank 1. Leaks into the secondary containment of the pump pit are detected by routine visual
13 inspections.

14 **Sump Tanks.** The sump tanks support the secondary containment system, and collect waste from several
15 sources, including:

- 16 • Process area drain trenches
- 17 • Tank overflows and drains
- 18 • Container washing water
- 19 • Resin dewatering solution
- 20 • Steam boiler blow down
- 21 • Sampler system drains.

22 These double-contained tanks are located within unlined, concrete vaults. The sump tank levels are
23 monitored by remote level indicators or through visual inspections from the sump covers. These
24 indicators are connected to high- and low-level alarms that are monitored in the control room. When a
25 high-level alarm is activated, a pump is activated and the sump tank contents usually are routed to the
26 secondary treatment train for processing. The contents also could be routed to the surge tank for
27 treatment in the primary treatment train. In the event of an abnormally high inflow rate, a second sump
28 pump is initiated automatically.

29 **Verification Tank Secondary Containment.** The three verification tanks are each mounted on
30 ringwalls with high-density polyethylene liners similar to the surge tank. The secondary containment for
31 the three tanks is reinforced concrete with a 15.2-centimeter thick floor and a 20.3-centimeter thick dike.
32 The dike extends up 2.6 meters to provide a containment of approximately 3,390,000 liters exceeding the
33 capacity of a single verification tank (See Table C.5).

34 The floor of the secondary containment slopes to a sump along the southern wall of the dike. Leaks into
35 the secondary containment are detected by level instrumentation in the sump that alarms in the control
36 room and/or by routine visual inspections. A sump pump is used to transfer solution in the secondary
37 containment to a sump tank.

38 **C.4.3.2 Additional Requirements for Specific Types of Systems**

39 This section addresses additional requirements in [WAC 173-303-640](#) for double-walled tanks like the
40 sump tanks and secondary containment for ancillary equipment and piping associated with the tank
41 systems.

42 **C.4.3.2.1 Double-Walled Tanks**

43 The sump tanks are the only tanks in the 200 Area ETF classified as 'double-walled' tanks. These tanks
44 are located in unlined concrete vaults and support the secondary containment system for the process area.
45 The sump tanks are equipped with a leak detector between the walls of the tanks that provide continuous
46 monitoring for leaks. The leak detector provides immediate notification through an alarm in the control
47 room. The inner tanks are contained completely within the outer shells. The tanks are contained

1 completely within the concrete structure of the 200 Area ETF so corrosion protection from external
2 galvanic corrosion is not necessary.

3 **C.4.3.2.2 Ancillary Equipment**

4 The secondary containment provided for the tanks and process systems also serves as secondary
5 containment for the ancillary equipment associated with these systems.

6 **Ancillary Equipment.** Section D.4.3.1.2 describes the secondary containment systems that also serve
7 most of the ancillary equipment within the 200 Area ETF. Between the 200 Area ETF and the
8 verification tanks, a pipeline trench provides secondary containment for four pipelines connecting the
9 transfer pumps (i.e., discharge and return pumps) in the 200 Area ETF with the verification tanks
10 (Figure C.2). This concrete trench crosses under the road and extends from the verification tank pumps to
11 the verification tanks. Treated effluent flows through these pipelines from the verification tank pumps to
12 the verification tanks. The return pump is used to return effluent to the 200 Area ETF for use as service
13 water or for reprocessing.

14 For all of the ancillary equipment housed within the ETF, the concrete floor, trenches, and berms form the
15 secondary containment system. For the ancillary equipment of the surge tank and the verification tanks,
16 secondary containment is provided by the concrete floors and dikes associated with these tanks. The
17 concrete floor and pit provide secondary containment for the ancillary equipment of the load-in tanks.

18 **Transfer Piping and Pipe Trenches.** The two buried transfer lines between LERF and the surge tank
19 have secondary containment in a pipe-within-a-pipe arrangement. The 4-inch transfer line has an 8-inch
20 outer pipe, while the 3-inch transfer, line has a 6-inch outer pipe. The pipes are fiberglass and are sloped
21 towards the surge tank. The outer piping ends with a drain valve in the surge tank secondary
22 containment.

23 These pipelines are equipped with leak detection located in the annulus between the inner and outer pipes;
24 the leak detection equipment can continuously 'inspect' the pipelines during aqueous waste transfers. The
25 alarms on the leak detection system are monitored in the control room. A low-volume air purge of the
26 annulus is provided to prevent condensation buildup and minimize false alarms by the leak detection
27 system. In the event that these leak detectors are not in service, the pipelines are inspected during
28 transfers by opening a drain valve to check for solution in the annular space between the inner and outer
29 pipe.

30 The 3-inch transfer line between the load-in tanks and the surge tank has a 6-inch outer pipe in a pipe-
31 within-a-pipe arrangement. The piping is made of fiberglass-reinforced plastic and slopes towards the
32 load-in tank secondary containment pit. The drain valve and leak detection system for the load-in tank
33 pipelines are operated similarly to the leak detection system for the LERF to 200 Area ETF pipelines.

34 As previously indicated, a reinforced concrete pipe trench provides secondary containment for piping
35 under the roadway between the 200 Area ETF and the verification tanks. Three 15.2 centimeter thick
36 reinforced concrete partitions divide the trench into four portions and support metal gratings over the
37 trench. Each portion of the trench is 1.2 meters wide, 0.76 meter deep, and slopes To route any solution
38 present to 4-inch drain lines through the north wall of the ETF building. These drain lines route solution
39 to sump tank 2 in ETF. The floor of the pipe trench is 30.5 centimeters thick and the sides are
40 15.2 centimeters thick. The concrete trenches are coated with water sealant and covered with metal
41 gratings at ground level to allow vehicle traffic on the roadway.

42 **C.4.4 Tank Management Practices**

43 When an aqueous waste stream is identified for treatment or storage at 200 Area ETF, the generating unit
44 is required to characterize the waste. Based on characterization data, the waste stream is evaluated to
45 determine if the stream is acceptable for treatment or storage. Specific tank management practices are
46 discussed in the following sections.

1 **C.4.4.1 Rupture, Leakage, Corrosion Prevention**

2 Most aqueous waste streams can be managed such that corrosion would not be a concern. For example,
3 an aqueous waste stream with high concentrations of chloride might cause corrosion problems when
4 concentrated in the secondary treatment train. One approach is to adjust the corrosion control measures in
5 the secondary treatment train. An alternative might be to blend this aqueous waste in a LERF basin with
6 another aqueous waste that has sufficient dissolved solids, such that the concentration of the chlorides in
7 the secondary treatment train would not pose a corrosion concern.

8 Additionally, the materials of construction used in the tanks systems (Table C.5) make it unlikely that an
9 aqueous waste would corrode a tank. For more information on corrosion prevention, refer to
10 Addendum B, Waste Analysis Plan.

11 If operating experience suggests that most aqueous waste streams can be managed such that corrosion
12 would not be a concern, operating practices and integrity assessment schedules and requirements will be
13 reviewed and modified as appropriate.

14 When a leak in a tank system is discovered, the leak is immediately contained or stopped by isolating the
15 leaking component. Following containment, the requirements of [WAC 173-303-640\(7\)](#), incorporated by
16 reference, are followed. These requirements include repair or closure of the tank/tank system component,
17 and certification of any major repairs.

18 **C.4.4.2 Overfilling Prevention**

19 Operating practices and administrative controls used at the 200 Area ETF to prevent overfilling a tank are
20 discussed in the following paragraphs. The 200 Area ETF process is controlled by the MCS. The MCS
21 monitors liquid levels in the 200 Area ETF tanks and has alarms that annunciate on high-liquid level to
22 notify operators that actions must be taken to prevent overfilling of these vessels. As an additional
23 precaution to prevent spills, many tanks are equipped with overflow lines that route solutions to sump
24 tanks 1 and 2. These tanks include the pH adjustment tank; RO feed tanks, effluent pH adjustment tank,
25 secondary waste receiving tanks, and concentrate tanks.

26 The following section discusses feed systems, safety cutoff devices, bypass systems, and pressure
27 controls for specific tanks and process systems.

28 **Tanks.** All tanks are equipped with liquid level sensors that give a reading of the tank liquid volume. All
29 of the tanks are equipped further with liquid level alarms that are actuated if the liquid volume is near the
30 tank overflow capacity. In the actuation of the surge tank alarm, a liquid level switch trips, sending a
31 signal to the valve actuator on the tank influent lines, and causing the influent valves to close.

32 The operating mode for each verification tank, i.e., receiving, holding, or discharging, can be designated
33 through the MCS; modes also switch automatically. When the high-level set point on the receiving
34 verification tank is reached, the flow to this tank is diverted and another tank becomes the receiver. The
35 full tank is switched into verification mode. The third tank is reserved for discharge mode.

36 The liquid levels in the pH adjustment, first and second RO feed, and effluent pH adjustment tanks are
37 maintained within predetermined operating ranges. Should any of these tanks overflow, the excess waste
38 is piped along with any leakage from the feed pumps to a sump tank.

39 When waste in a secondary waste-receiving tank reaches the high-level set point, the influent flow of
40 waste is redirected to the second tank. In a similar fashion, the concentrate tanks switch receipt modes
41 when the high-level set point of one tank is reached.

42 **Filter Systems.** All filters at 200 Area ETF (i.e., the Load-In Station, rough, fine, and auxiliary filter
43 systems) are in leak-tight steel casings. For the rough and fine filters, a high differential pressure, which
44 could damage the filter element, activates a valve that shuts off liquid flow to protect the filter element
45 from possible damage. To prevent a high-pressure situation, the filters are cleaned routinely with pulses
46 of compressed air that force water back through the filter. Cleaning is terminated automatically by
47 shutting off the compressed air supply if high pressure develops. The differential pressure across the

1 auxiliary filters also is monitored. A high differential pressure in these filters would result in a system
2 shutdown to allow the filters to be changed out.

3 The Load-In Station filtration system has pressure gauges for monitoring the differential pressure across
4 each filter. A high differential pressure would result in discontinuing filter operation until the filter is
5 replaced.

6 **Ultraviolet Light/Oxidation System and Decomposers.** A rupture disk on the inlet piping to each of
7 the UV/OX reaction vessels relieves to the pH adjustment tank in the event of excessive pressure
8 developing in the piping system. Should the rupture disk fail, the aqueous waste would trip the moisture
9 sensor, shut down the UV lamps, and close the surge tank feed valve. Also provided is a level sensor to
10 protect UV lamps against the risk of exposure to air. Should those sensors be actuated, the UV lamps
11 would be shut down immediately.

12 The piping and valving for the hydrogen peroxide decomposers are configured to split the waste flow:
13 half flows to one decomposer and half flows to the other decomposer. Alternatively, the total flow of
14 waste can be treated in one decomposer or both decomposers can be bypassed. A safety relief valve on
15 each decomposer vessel can relieve excess system pressure to a sump tank.

16 **Degasification System.** The degasification column is typically supplied aqueous waste feed by the pH
17 adjustment tank feed pump. This pump transfers waste solution through the hydrogen peroxide
18 decomposer, the fine filter, and the degasification column to the first RO feed tank.

19 The degasification column is designed for operation at a partial vacuum. A pressure sensor in the outlet
20 of the column detects the column pressure. The vacuum in the degasification column is maintained by a
21 blower connected to the vessel off gas system. The column is protected from extremely low pressure
22 developed by the column blower by the use of an intake vent that is maintained in the open position
23 during operation. The column liquid level is regulated by a flow control system with a high- and low-
24 level alarm. Plate-type heat exchanger cools the waste solution fed to the degasification column.

25 **Reverse Osmosis System.** The flow through the first and second RO stages is controlled to maintain
26 constant liquid levels in the first and second stage RO feed tanks.

27 **Polisher.** Typically, two of the three columns are in operation (lead/lag) and the third (regenerated)
28 column is in standby. When the capacity of the resin in the first column is exceeded, as detected by an
29 increase in the conductivity of the column effluent, the third column, containing freshly regenerated IX
30 resin, is brought online. The first column is taken offline, and the waste is rerouted to the second column,
31 and to the third. Liquid level instrumentation and automatically operated valves are provided in the IX
32 system to prevent overflowing.

33 **Effluent Treatment Facility Evaporator.** Liquid level instrumentation in the secondary waste receiving
34 tanks is designed to preclude a tank overflow. A liquid level switch actuated by a high-tank liquid level
35 causes the valves to reposition, closing off flow to the secondary waste receiving tanks. Secondary
36 containment for these tanks routes liquids to a sump tank.

37 Valves in the 200 Area ETF evaporator feed line can be positioned to bypass the secondary waste around
38 the 200 Area ETF evaporator and to transfer the secondary waste to the concentrate tanks.

39 **Thin Film Dryer.** The two concentrate tanks alternately feed the thin film dryer. Typically, one tank
40 serves as a concentrate waste receiver while the other tank serves as the dryer feed tank. One tank may
41 serve as both concentrate waste receiver and dryer feed tank. Liquid level instrumentation prevents tank
42 overflow by diverting the concentrate flow from the full concentrate tank to the other concentrate tank.
43 Secondary containment for these tanks routes liquids to a sump tank.

44 An alternate route is provided from the concentrate receiver tank to the secondary waste receiving tanks.
45 Dilute concentrate in the concentrate receiver tank can be reprocessed through the 200 Area ETF
46 evaporator by transferring the concentrate back to a secondary waste-receiving tank.

1 **C.4.5 Labels or Signs**

2 Each tank or process unit in the 200 Area ETF is identified by a nameplate attached in a readily visible
3 location. Included on the nameplate are the equipment number and the equipment title. Those tanks that
4 store or treat dangerous waste at the 200 Area ETF (Section 4C.4.1.1) are identified with a label, which
5 reads *PROCESS WATER/WASTE*. The labels are legible at a distance of at least fifty feet or as
6 appropriate for legibility within the ETF. Additionally, these tanks bear a legend that identifies the waste
7 in a manner, which adequately warns employees, emergency personnel, and the public of the major risk(s)
8 associated with the waste being stored or treated in the tank system(s).

9 Caution plates are used to show possible hazards and warn that precautions are necessary. Caution signs
10 have a yellow background and black panel with yellow letters and bear the word *CAUTION*. Danger
11 signs show immediate danger and signify that special precautions are necessary. These signs are red,
12 black, and white and bear the word *DANGER*.

13 Tanks and vessels containing corrosive chemicals are posted with black and white signs bearing the word
14 *CORROSIVE. DANGER - UNAUTHORIZED PERSONNEL KEEP OUT* signs are posted on all exterior
15 doors of the ETF, and on each interior door leading into the process area. Tank ancillary piping is also
16 labeled *PROCESS WATER* or *PROCESS LIQUID* to alert personnel which pipes in the process area
17 contains dangerous and/or mixed waste.

18 All tank systems holding dangerous waste are marked with labels or signs to identify the waste contained
19 in the tanks. The labels or signs are legible at a distance of at least 50-feet and bear a legend that
20 identifies the waste in a manner that adequately warns employees, emergency response personnel, and the
21 public, of the major risk(s) associated with the waste being stored or treated in the tank system(s).

22 **C.4.6 Air Emissions**

23 Tank systems that contain extremely hazardous waste that is acutely toxic by inhalation must be designed
24 to prevent the escape of such vapors. To date, no extremely hazardous waste has been managed in
25 200 Area ETF tanks and is not anticipated. However, the 200 Area ETF tanks have forced ventilation that
26 draws air from the tank vapor spaces to prevent exposure of operating personnel to any toxic vapors that
27 might be present. The vapor passes through a charcoal filter and two sets of high-efficiency particulate
28 air filters before discharge to the environment. The Load-in tanks and verification tanks are vented to the
29 atmosphere.

30 **C.4.7 Management of Ignitable or Reactive Wastes in Tanks Systems**

31 Although the 200 Area ETF is permitted to accept waste that is designated ignitable or reactive, such
32 waste would be treated or blended immediately after placement in the tank system so that the resulting
33 waste mixture is no longer ignitable or reactive. Aqueous waste received does not meet the definition of a
34 combustible or flammable liquid given in National Fire Protection Association (NFPA) code number
35 30 (NFPA 1996). The buffer zone requirements in NFPA-30, which require tanks containing combustible
36 or flammable solutions be a safe distance from each other and from public way, are not applicable.

37 **C.4.8 Management of Incompatible Wastes in Tanks Systems**

38 The 200 Area ETF manages dilute solutions that can be mixed without compatibility issues. The
39 200 Area ETF is equipped with several systems that can adjust the pH of the waste for treatment
40 activities. Sulfuric acid and sodium hydroxide are added to the process through the MCS for pH
41 adjustment to ensure there will be no large pH fluctuations and adverse reactions in the tank systems.

42 **C.5 SURFACE IMPOUNDMENTS**

43 This section provides specific information on surface impoundment operations at the LERF, including
44 descriptions of the liners and secondary containment structures, as required by [WAC 173-303-650](#) and
45 [WAC 173-303-806\(4\)\(d\)](#).

1 The LERF consists of three lined surface impoundments (basins) with a design operating capacity of
2 29.5 million liters each. The maximum capacity of each basin is 34 million liters. The dimensions of
3 each basin at the anchor wall are approximately 103 meters by 85 meters. The typical top dimensions of
4 the wetted area are approximately 89 meters by 71 meters, while the bottom dimensions are
5 approximately 57 by 38 meters. Total depth from the top of the dike to the bottom of the basin is
6 approximately 7 meters. The typical finished basin bottoms lie at about 4 meters below the initial grade
7 and 175 meters above sea level. The dikes separating the basins have a typical height of 3 meters and
8 typical top width of 11.6 meters around the perimeter of the impoundments.

9 **C.5.1 List of Dangerous Waste**

10 A list of dangerous and/or mixed aqueous waste that can be stored in LERF is presented in Addendum A.
11 Addendum B, Waste Analysis Plan also provides a discussion of the types of waste that are managed in
12 the LERF.

13 **C.5.2 Construction, Operation, and Maintenance of Liner System**

14 General information concerning the liner system is presented in the following sections. Information
15 regarding loads on the liner, liner coverage, UV light exposure prevention, and location relative to the
16 water table are discussed.

17 **C.5.2.1 Liner Construction Materials**

18 The LERF employs a double-composite liner system with a leachate detection, collection, and removal
19 system between the primary and secondary liners. Each basin is constructed with an upper or primary
20 liner consisting of a high-density polyethylene geomembrane laid over a bentonite carpet liner. The lower
21 or secondary liner in each basin is a composite of a geomembrane laid over a layer of soil/bentonite
22 admixture with a hydraulic conductivity less than 10^{-7} centimeters per second. The synthetic liners extend
23 up the dike wall to a concrete anchor wall that surrounds the basin at the top of the dike. A batten system
24 bolts the layers in place to the anchor wall (Figure C.16).

25 Figure C.17 is a schematic cross-section of the liner system. The liner components, listed from the top to
26 the bottom of the liner system, are the following:

- 27 • Primary 1.5-millimeter high-density polyethylene geomembrane
- 28 • Bentonite carpet liner
- 29 • Geotextile
- 30 • Drainage gravel (bottom) and geonet (sides)
- 31 • Geotextile
- 32 • Secondary 1.5-millimeter high-density polyethylene geomembrane
- 33 • Soil/bentonite admixture (91 centimeters on the bottom, 107 centimeters on the sides)
- 34 • Geotextile

35 The primary geomembrane, made of 1.5-millimeter high-density polyethylene, forms the basin surface
36 that holds the aqueous waste. The secondary geomembrane, also 1.5-millimeter high-density
37 polyethylene, forms a barrier surface for leachate that might penetrate the primary liner. The high-density
38 polyethylene chemically is resistant to constituents in the aqueous waste and has a relatively high strength
39 compared to other lining materials. The high-density polyethylene resin specified for the LERF contains
40 carbon black, antioxidants, and heat stabilizers to enhance its resistance to the degrading effects of UV
41 light. The approach to ensuring the compatibility of aqueous waste streams with the LERF liner materials
42 and piping is discussed in Addendum B, Waste Analysis Plan.

43 Three geotextile layers are used in the LERF liner system. The layers are thin, nonwoven polypropylene
44 fabric that chemically is resistant, highly permeable, and resistant to microbiological growth. The first
45 two layers prevent fine soil particles from infiltrating and clogging the drainage layer. The second
46 geotextile also provides limited protection for the secondary geomembrane from the drainage rock. The
47 third geotextile layer prevents the mixing of the soil/bentonite admixture with the much more porous and
48 granular foundation material.

1 A 30.5-centimeters-thick gravel drainage layer on the bottom of the basins between the primary and
2 secondary liners provides a flow path for liquid to the leachate detection, collection, and removal system.
3 A geonet (or drainage net) is located immediately above the secondary geomembrane on the basin
4 sidewalls. The geonet functions as a preferential flow path for liquid between the liners, carrying liquid
5 down to the gravel drainage layer and subsequently to the leachate sump. The geonet is a mesh made of
6 high-density polyethylene, with approximately 13-millimeter openings.

7 The soil/bentonite layer is 91 centimeters thick on the bottom of the basins and 107 centimeters thick on
8 the basin sidewalls; its permeability is less than 10^{-7} centimeters per second. This composite liner design,
9 consisting of a geomembrane laid over essentially impermeable soil/bentonite, is considered best
10 available technology for solid waste landfills and surface impoundments. The combination of synthetic
11 and clay liners is reported in the literature to provide the maximum protection from waste migration
12 (Forseth and Kmet 1983).

13 A number of laboratory tests were conducted to measure the engineering properties of the soil/bentonite
14 admixture, in addition to extensive field tests performed on three test fills constructed near the LERF site.
15 For establishing an optimum ratio of bentonite to soil for the soil/bentonite admixture, mixtures of various
16 ratios were tested to determine permeability and shear strength. A mixture of 12 percent bentonite was
17 selected for the soil/bentonite liner and tests described in the following paragraphs demonstrated that the
18 admixture meets the desired permeability of less than 10^{-7} centimeters per second. Detailed discussion of
19 test procedures and results is provided in Report of Geotechnical Investigation, 242-A Evaporation and
20 PUREX Interim Storage Basins (Chen-Northern 1990).

21 Direct shear tests were performed according to ASTM D3080 test procedures (ASTM 1990) on
22 soil/bentonite samples of various ratios. Based on these results, the conservative minimum Mohr-
23 Coulomb shear strength value of 30 degrees was estimated for a soil/bentonite admixture containing
24 12 percent bentonite.

25 The high degree of compaction of the soil/bentonite layer [92 percent per ASTM D1557 (ASTM 1991)]
26 was expected to maximize the bonding forces between the clay particles, thereby minimizing moisture
27 transport through the liner. With respect to particle movement ('piping'), estimated fluid velocities in this
28 low-permeability material are too low to move the soil particles. Therefore, piping is not considered a
29 problem.

30 For the soil/bentonite layer, three test fills were constructed to demonstrate that materials, methods, and
31 procedures used would produce a soil/bentonite liner that meets the EPA permeability requirement of less
32 than 10^{-7} centimeters per second. All test fills met the EPA requirements. A thorough discussion of
33 construction procedures, testing, and results is provided in *Report of Permeability Testing, Soil-bentonite*
34 *Test Fill* (Chen-Northern 1991a).

35 The aqueous waste stored in the LERF is typically a dilute mixture of organic and inorganic constituents.
36 Though isolated instances of soil liner incompatibility have been documented in the literature (Forseth
37 and Kmet 1983), these instances have occurred with concentrated solutions that were incompatible with
38 the geomembrane liners in which the solutions were contained. Considering the dilute nature of the
39 aqueous waste that is and will be stored in LERF and the moderate pH, and test results demonstrating the
40 compatibility of the high-density polyethylene liners with the aqueous waste [9090 Test Results
41 (WHC 1991)], gross failure of the soil/bentonite layer is not probable.

42 Each basin also is equipped with a floating very low-density polyethylene cover. The cover is anchored
43 and tensioned at the concrete wall at the top of the dikes, using a patented mechanical tensioning system.
44 Figure C.16 depict the tension mechanism and the anchor wall at the perimeter of each basin. Additional
45 information on the cover system is provided in Section C.5.2.5.

46 **C.5.2.1.1 Material Specifications**

47 Material specifications for the liner system and leachate collection system, including liners, drainage
48 gravel, and drainage net are discussed in the following sections. Material specifications are documented

1 in the *Final Specifications 242-A Evaporator and PUREX Interim Retention Basins* (KEH 1990a) and
2 *Construction Specifications for 242-A Evaporator and PUREX Interim Retention Basins* (KEH 1990b).

3 **Geomembrane Liners.** The high-density polyethylene resin for geomembranes for the LERF meets the
4 material specifications listed in Table C.9. Key physical properties include thickness (1.5 millimeters
5 [60 mil]) and impermeability (hydrostatic resistance of over 360,000 kilogram per square meter).
6 Physical properties meet National Sanitation Foundation Standard 54 (NSF 1985). Testing to determine
7 if the liner material is compatible with typical dilute waste solutions was performed and documented in
8 *9090 Test Results* (WHC 1991).

9 **Soil/Bentonite Liner.** The soil/bentonite admixture consists of 11.5 to 14.5 percent bentonite mixed into
10 well-graded silty sand with a maximum particle size of 4.75 millimeters (No. 4 sieve). Test fills were
11 performed to confirm the soil/bentonite admixture applied at LERF has hydraulic conductivity less than
12 10^{-7} centimeters per second, as required by [WAC 173-303-650\(2\)\(j\)](#) for new surface impoundments.

13 **Bentonite Carpet Liner.** The bentonite carpet liner consists of bentonite (90 percent sodium
14 montmorillonite clay) in a primary backing of woven polypropylene with nylon filler fiber, and a cover
15 fabric of open weave spunlace polyester. The montmorillonite is anticipated to retard migration of
16 solution through the liner, exhibiting a favorable cation exchange for adsorption of some constituents
17 (such as ammonium). Based on composition of the bentonite carpet and of the type of aqueous waste
18 stored at LERF, no chemical attack, dissolution, or degradation of the bentonite carpet liner is anticipated.

19 **Geotextile.** The nonwoven geotextile layers consist of long-chain polypropylene polymers containing
20 stabilizers and inhibitors to make the filaments resistant to deterioration from UV light and heat exposure.
21 The geotextile layers consist of continuous geotextile sheets held together by needle punching. Edges of
22 the fabric are sealed or otherwise finished to prevent outer material from pulling away from the fabric or
23 raveling.

24 **Drainage Gravel.** The drainage layer consists of thoroughly washed and screened, naturally occurring
25 rock meeting the size specifications for Grading Number 5 in Washington State Department of
26 Transportation construction specifications (WSDOT 1988). The specifications for the drainage layer are
27 given in Table C.10. Hydraulic conductivity tests (Chen-Northern 1992a, 1992b, 1992c) showed the
28 drainage rock used at LERF met the sieve requirements and had a hydraulic conductivity of at least
29 1 centimeter per second, which exceeded the minimum of at least 0.1 centimeters per second required by
30 [WAC 173-303-650\(2\)\(j\)](#) for new surface impoundments.

31 **Geonet.** The geonet is fabricated from two sets of parallel high-density polyethylene strands, spaced
32 1.3 centimeters center-to-center maximum to form a mesh with minimum two strands per 2.54 centimeter
33 in each direction. The geonet is located between the liners on the sloping sidewalls to provide a
34 preferential flow path for leachate to the drainage gravel and subsequently to the leachate sump.

35 **Leachate Collection Sump.** Materials used to line the 3.0-meter by 1.8-meter by 0.30-meter-deep
36 leachate sump, at the bottom of each basin in the northwest corner, include [from top to bottom
37 (Figure C.18)]:

- 38 • 25 millimeter high-density polyethylene flat stock (supporting the leachate riser pipe)
- 39 • Geotextile
- 40 • 1.5-millimeter high-density polyethylene rub sheet
- 41 • Secondary composite liner:
 - 42 – 1.5-millimeter high-density polyethylene geomembrane
 - 43 – 91 centimeters of soil/bentonite admixture
 - 44 – Geotextile

45 Specifications for these materials are identical to those discussed previously.

46 **Leachate System Risers.** Risers for the leachate system consist of 10-inch and 4-inch pipes from the
47 leachate collection sump to the catch basin northwest of each basin (Figure C.18). The risers lay below

1 the primary liner in a gravel-filled trench that also extends from the sump to the concrete catch basin
2 (Figure C.19).

3 The risers are high-density polyethylene pipes fabricated to meet the requirements in ASTM D1248
4 (ASTM 1989). The 10-inch riser is perforated every 20.3 centimeters with 1.3-centimeter holes around
5 the diameter. Level sensors and leachate pump are inserted in the 10-inch riser to monitor and remove
6 leachate from the sump. To prevent clogging of the pump and piping with fine particulate, the end of the
7 riser is encased in a gravel-filled box constructed of high-density polyethylene geonet and wrapped in
8 geotextile. The 4-inch riser is perforated every 10.2 centimeters with 0.64-centimeter holes around the
9 diameter. A level detector is inserted in the 4-inch riser.

10 **Leachate Pump.** A deep-well submersible pump, designed to deliver approximately 110 liters per
11 minute, is installed in the 10-inch leachate riser in each basin. Wetted parts of the leachate pump are
12 made of 316L stainless steel, providing both corrosion resistance and durability.

13 **C.5.2.1.2 Loads on Liner System**

14 The LERF liner system is subjected to the following types of stresses.

15 **Stresses from Installation or Construction Operations.** Contractors were required to submit
16 construction quality control plans that included procedures, techniques, tools, and equipment used for the
17 construction and care of liner and leachate system. Methods for installation of all components were
18 screened to ensure that the stresses on the liner system were kept to a minimum.

19 Calculations were performed to estimate the risk of damage to the secondary high-density polyethylene
20 liner during construction (*Calculations for LERF Part B Permit Application* [HNF 1997]). The greatest
21 risk expected was from spreading the gravel layer over the geotextile layer and secondary geomembrane.
22 The results of the calculations show that the strength of the geotextile was sufficiently high to withstand
23 the stress of a small gravel spreader driving on a minimum of 15 centimeters of gravel over the geotextile
24 and geomembrane. The likelihood of damage to the geomembrane lying under the geotextile was
25 considered low.

26 To avoid driving heavy machinery directly on the secondary liner, a 28-meter conveyer was used to
27 deliver the drainage gravel into the basins. The gravel was spread and consolidated by hand tools and a
28 bulldozer. The bulldozer traveled on a minimum thickness of 30.5 centimeters of gravel. Where the
29 conveyer assembly was placed on top of the liner, cribbing was placed to distribute the conveyer weight.
30 No heavy equipment was allowed for use directly in contact with the geomembranes.

31 Additional calculations were performed to estimate the ability of the leachate riser pipe to withstand the
32 static and dynamic loading imposed by lightweight construction equipment riding on the gravel layer
33 (HNF 1997). Those calculations demonstrated that the pipe could buckle under the dynamic loading of
34 small construction equipment; therefore, the pipe was avoided by equipment during spreading of the
35 drainage gravel.

36 Installation of synthetic lining materials proceeded only when winds were less than 24 kilometers per
37 hour, and not during precipitation. The minimum ambient air temperature for unfolding or unrolling the
38 high-density polyethylene sheets was -10 C, and a minimum temperature of 0 C was required for seaming
39 the high-density polyethylene sheets. Between shifts, geomembranes and geotextile were anchored with
40 sandbags to prevent lifting by wind. Calculations were performed to determine the appropriate spacing of
41 sandbags on the geomembrane to resist lifting caused by 130 kilometer per hour winds (HNF 1997). All
42 of the synthetic components contain UV light inhibitors and no impairment of performance is anticipated
43 from the short-term UV light exposure during construction. Section C.5.2.4 provides further detail on
44 exposure prevention.

45 During the laying of the soil/bentonite layer and the overlying geomembrane, moisture content of the
46 admixture was monitored and adjusted to ensure optimum compaction and to avoid development of
47 cracks.

1 **C.5.2.1.3 Static and Dynamic Loads and Stresses from the Maximum Quantity of Waste**

2 When a LERF basin is full, liquid depth is approximately 6.4 meters. Static load on the primary liner is
3 roughly 6,400 kilograms per square meter. Load on the secondary liner is slightly higher because of the
4 weight of the gravel drainage layer. Assuming a density of 805 kilograms per square meter for the
5 drainage gravel [conservative estimate based on specific gravity of 2.65 (Ambrose 1988)], the secondary
6 high-density polyethylene liner carries approximately 7,200 kilograms per square meter when a basin is
7 full.

8 Side slope liner stresses were calculated for each of the layers in the basin sidewalls and for the pipe
9 trench on the northwest corner of each basin (HNF 1997). Results of these calculations indicate factors of
10 safety against shear were 1.5 or greater for the primary geomembrane, geotextile, geonet, and secondary
11 geomembrane.

12 Because the LERF is not located in an area of seismic concern, as identified in Appendix VI of
13 [40 CFR 264](#) and [WAC 173-303-282\(6\)\(a\)\(I\)](#), discussion and calculation of potential seismic events are
14 not required.

15 **C.5.2.1.4 Stresses Resulting from Settlement, Subsidence, or Uplift**

16 Uplift stresses from natural sources are expected to have negligible impact on the liner. Groundwater lies
17 approximately 62 meters below the LERF, average annual precipitation is only 16 centimeters, and the
18 average unsaturated permeability of the soils near the basin bottoms is high, ranging from about
19 5.5×10^4 centimeters per second to about 1 centimeter per second (Chen-Northern 1991b). Therefore, no
20 hydrostatic uplift forces are expected to develop in the soil underneath the basins. In addition, the soil
21 under the basins consists primarily of gravel and sand, and contains few or no organic constituents.
22 Therefore, uplift caused by gas production from organic degradation is not anticipated.

23 Based on the design of the soil-bentonite liner, no structural uplift stresses are present within the lining
24 system (Chen-Northern 1991b).

25 Regional subsidence is not anticipated because neither petroleum nor extractable economic minerals are
26 present in the strata underlying the LERF basins, nor is karst (erosive limestone) topography present.

27 Dike soils and soil/bentonite layers were compacted thoroughly and proof-rolled during construction.
28 Calculation of settlement potential showed that combined settlement for the foundation and soil/bentonite
29 layer is expected to be about 2.7 centimeters. Settlement impact on the liner and basin stability is
30 expected to be minimal (Chen-Northern 1991b).

31 **C.5.2.1.5 Internal and External Pressure Gradients**

32 Pressure gradients across the liner system from groundwater are anticipated to be negligible. The LERF
33 is about 62 meters above the seasonal high water table, which prevents buildup of water pressure below
34 the liner. The native gravel foundation materials of the LERF are relatively permeable and free draining.
35 The 2 percent slope of the secondary liner prevents the pooling of liquids on top of the secondary liner.
36 Finally, the fill rate of the basins is slow enough (average 190 liters per minute) that the load of the liquid
37 waste on the primary liner is gradually and evenly distributed.

38 To prevent the buildup of gas between the liners, each basin is equipped with 21 vents in the primary
39 geomembrane located above the maximum water level that allow the reduction of any excess gas
40 pressure. Gas passing through these vents exit through a single pipe that penetrates the anchor wall into a
41 carbon adsorption filter. This filter extracts nearly all of the organic compounds, ensuring that emissions
42 to the air from the basins are not toxic.

43 **C.5.2.2 Liner System Location Relative to High-Water Table**

44 The lowest point of each LERF basin is the northwest corner of the sump, where the typical subgrade
45 elevation is 175 meters above mean sea level. Based on data collected from the groundwater monitoring
46 wells at the LERF site, the seasonal high-water table is located approximately 62 meters or more below

1 the lowest point of the basins. This substantial thickness of unsaturated strata beneath the LERF provides
2 ample protection to the liner from hydrostatic pressure because of groundwater intrusion into the
3 soil/bentonite layer. Further discussion of the unsaturated zone and site hydrogeology is provided in
4 Addendum D, Groundwater Monitoring Plan.

5 **C.5.2.3 Liner System Foundation**

6 Foundation materials are primarily gravels and cobbles with some sand and silt. The native soils onsite
7 are derived from unconsolidated Holocene sediments. These sediments are fluvial and glaciofluvial sands
8 and gravels deposited during the most recent glacial and postglacial event. Grain-size distributions and
9 shape analyses of the sediments indicate that deposition occurred in a high-energy environment (Chen-
10 Northern 1990).

11 Analysis of five soil borings from the LERF site was conducted to characterize the natural foundation
12 materials and to determine the suitability of onsite soils for construction of the impoundment dikes and
13 determine optimal design factors. Well-graded gravel containing varying amounts of silt, sand, and
14 cobbles comprises the layer in which the basins were excavated. This gravel layer extends to depths of
15 10 to 11 meters below land surface (Chen-Northern 1990). The basins are constructed directly on the
16 subgrade. Excavated soils were screened to remove oversize cobbles (greater than 15 centimeters in the
17 largest dimension) and used to construct the dikes.

18 Settlement potential of the foundation material and soil/bentonite layer was found to be low. The
19 foundation is comprised of undisturbed native soils. The bottom of the basin excavation lies within the
20 well-graded gravel layer, and is dense to very dense. Below the gravel is a layer of dense to very dense
21 poorly graded and well-graded sand. Settlement was calculated for the gravel foundation soils and for the
22 soil/bentonite layer, under the condition of hydrostatic loading from 6.4 meters of fluid depth. The
23 combined settlement for the soils and the soil/bentonite layer is estimated to be about 2.7 centimeters.
24 This amount of settlement is expected to have minimal impact on overall liner or basin stability
25 (Chen-Northern 1991b). Settlement calculations are provided in *Calculations for Liquid Effluent*
26 *Retention Facility Part B Permit Application* (HNF 1997).

27 The load bearing capacity of the foundation material, based on the soil analysis discussed previously, is
28 estimated at about 48,800 kilograms per square meter [maximum advisable presumptive bearing capacity
29 (Hough 1969)]. Anticipated static and dynamic loading from a full basin is estimated to be less than
30 9,000 kilograms per square meter (Section C.5.2.1.3), which provides an ample factor of safety.

31 When the basins are empty, excess hydrostatic pressure in the foundation materials under the liner system
32 theoretically could result in uplift and damage. However, because the native soil forming the foundations
33 is unsaturated and relatively permeable, and because the water table is located at a considerable depth
34 beneath the basins, any infiltration of surface water at the edge of the basin is expected to travel
35 predominantly downward and away from the basins, rather than collecting under the excavation itself.
36 No gas is expected in the foundation because gas-generating organic materials are not present.

37 Subsidence of undisturbed foundation materials is generally the result of fluid extraction (water or
38 petroleum), mining, or karst topography. Neither petroleum, mineral resources, nor karst are believed to
39 be present in the sediments overlying the Columbia River basalts. Potential groundwater resources do
40 exist below the LERF. Even if these sediments were to consolidate from fluid withdrawal, their depth
41 most likely would produce a broad, gently sloping area of subsidence that would not cause significant
42 strains in the LERF liner system. Consequently, the potential for subsidence related failures are expected
43 to be negligible.

44 Borings at the LERF site, and extensive additional borings in the 200 East Area, have not identified any
45 significant quantities of soluble materials in the foundation soil or underlying sediments (Last et al. 1989).
46 Consequently, the potential for sinkholes is considered negligible.

1 **C.5.2.4 Liner System Exposure Prevention**

2 Both primary and secondary geomembranes and the floating cover are stabilized with carbon black to
3 prevent degradation from UV light. Furthermore, none of the liner layers experience long-term exposure
4 to the elements. During construction, thin polyethylene sheeting was used to maintain optimum moisture
5 content and provide protection from the wind for the soil/bentonite layer until the secondary
6 geomembrane was laid in place. The secondary geomembrane was covered by the geonet and geotextile
7 as soon as quality control testing was complete. Once the geotextile layer was completed, drainage
8 material immediately was placed over the geotextile. The final (upper) geotextile layer was placed over
9 the drainage gravel and immediately covered by the bentonite carpet liner. This was covered
10 immediately, in turn, by the primary high-density polyethylene liner.

11 Both high-density polyethylene liners, geotextile layers, and geonet are anchored permanently to a
12 concrete wall at the top of the basin berm. During construction, liners were held in place with many
13 sandbags on both the basin bottoms and side slopes to prevent wind from lifting and damaging the
14 materials. Calculations were performed to determine the amount of fluid needed in a basin to prevent
15 wind lift damage to the primary geomembrane. Approximately 15 to 20 centimeters of solution are kept
16 in each basin to minimize the potential for uplifting the primary liner (HNF 1997).

17 The entire lining system is covered by a very low-density polyethylene floating cover that is bolted to the
18 concrete anchor wall. The floating cover prevents evaporation and intrusion from dust, precipitation,
19 vegetation, animals, and birds. A patented tensioning system is employed to prevent wind from lifting the
20 cover and automatically accommodate changes in liquid level in the basins. The cover tension
21 mechanism consists of a cable running from the flexible geosynthetic cover over a pulley on the tension
22 tower (located on the concrete anchor wall) to a dead man anchor. These anchors (blocks) simply hang
23 from the cables on the exterior side of the tension towers. The anchor wall also provides for solid
24 attachment of the liner layers and the cover, using a 6.4-millimeter batten and neoprene gasket to bolt the
25 layers to the concrete wall, effectively sealing the basin from the intrusion of light, precipitation, and
26 airborne dust (Figure C.16).

27 The floating cover, made of very low-density polyethylene with UV light inhibitors, is not anticipated to
28 experience unacceptable degradation during the service life of the LERF. The very low-density
29 polyethylene material contains carbon black for UV light protection, anti-oxidants to prevent heat
30 degradation, and seaming enhancers to improve its ability to be welded. A typical manufacturer's limited
31 warranty for weathering of very low-density polyethylene products is 20 years (Poly America, undated).
32 This provides a margin of safety for the anticipated medium-term use of the LERF for aqueous waste
33 storage.

34 The upper 3.4 to 4.6 meters of the sidewall liner also could experience stresses in response to temperature
35 changes. Accommodation of thermal influences for the LERF geosynthetic layers is affected by inclusion
36 of sufficient slack as the liners were installed. Calculations demonstrate that approximately
37 67 centimeters of slack is required in the long basin bottom dimension, 46 centimeters across the basin,
38 and 34 centimeters from the bottom of the basin to the top of the basin wall (HNF 1997).

39 Thermal stresses also are experienced by the floating cover. As with the geomembranes, sufficient slack
40 was included in the design to accommodate thermal contraction and expansion.

41 **C.5.2.4.1 Liner Repairs During Operations**

42 Should repair of a basin liner be required while the basin is in operation, the basin contents will be
43 transferred to the 200 Area ETF or another available basin. After the liner around the leaking section is
44 cleaned, repairs to the geomembrane will be made by the application of a piece of high-density
45 polyethylene sheeting, sufficient in size to extend approximately 8 to 15 centimeters beyond the damaged
46 area, or as recommended by the vendor. A round or oval patch will be installed using the same type of
47 equipment and criteria used for the initial field installations.

1 **C.5.2.4.2 Control of Air Emissions**

2 The floating covers limit evaporation of aqueous waste and releases of volatile organic compounds into
3 the atmosphere. To accommodate volumetric changes in the air between the fluid in the basin and the
4 cover, and to avoid problems related to 'sealing' the basins too tightly, each basin is equipped with a
5 carbon filter breather vent system. Any air escaping from the basins must pass through this vent,
6 consisting of a pipe that penetrates the anchor wall and extends into a carbon adsorption filter unit.

7 **C.5.2.5 Liner Coverage**

8 The liner system covers the entire ground surface that underlies the retention basins. The primary liner
9 extends up the side slopes to a concrete anchor wall at the top of the dike encircling the entire basin
10 (Figure C.16).

11 **C.5.3 Prevention of Overtopping**

12 Overtopping prevention is accomplished through administrative controls and liquid-level instrumentation
13 installed in each basin. The instrumentation includes local liquid-level indication as well as remote
14 indication at the ETF. Before an aqueous waste is transferred into a basin, administrative controls are
15 implemented to ensure overtopping will not occur during the transfer. The volume of feed to be
16 transferred is compared to the available volume in the receiving basin. The transfer is not initiated unless
17 there is sufficient volume available in the receiving basin or a cut-off level is established. The transfer
18 into the basin would be stopped when this cut-off level is reached.

19 In the event of a 25-year, 24-hour storm event, precipitation would accumulate on the basin covers.
20 Through the self-tensioning design of the basin covers and maintenance of adequate freeboard, all
21 accumulated precipitation would be contained on the covers and none would flow over the dikes or
22 anchor walls. The 25-year, 24-hour storm is expected to deliver 5.3 centimeters of rain or approximately
23 61 centimeters of snow. Cover specifications include the requirement that the covers be able to withstand
24 the load from this amount of precipitation. Because the cover floats on the surface of the fluid in the
25 basin, the fluid itself provides the primary support for the weight of the accumulated precipitation.
26 Through the cover self-tensioning mechanism, there is ample 'give' to accommodate the overlying load
27 without overstressing the anchor and attachment points.

28 Rainwater and snow evaporate readily from the cover, particularly in the arid Hanford Facility climate,
29 where evaporation rates exceed precipitation rates for most months of the year. The black color of the
30 cover further enhances evaporation. Thus, the floating cover prevents the intrusion of precipitation into
31 the basin and provides for evaporation of accumulated rain or snow.

32 **C.5.3.1 Freeboard**

33 Under current operating conditions, 0.61 meter of freeboard is maintained at each LERF basin, which
34 corresponds to an operating level of 6.8 meters, or 29.5 million liters.

35 **C.5.3.2 Immediate Flow Shutoff**

36 The mechanism for transferring aqueous waste is either through pump transfers with on/off switches or
37 through gravity transfers with isolation valves. These methods provide positive ability to shut off
38 transfers immediately in the event of overtopping. Overtopping a basin during a transfer is very unlikely
39 because the low flow rate into the basin provides long response times. At a flow rate of 284 liters per
40 minute, approximately 11 days would be required to fill a LERF basin from the 6.8-meter operating level
41 (i.e., 0.61 meter of freeboard) to maximum capacity of 34 million liters (i.e., the 7.4-meter level).

42 **C.5.3.3 Outflow Destination**

43 Aqueous waste in the LERF is transferred routinely to 200 Area ETF for treatment. However, should it
44 be necessary to immediately empty a basin, the aqueous waste either would be transferred to the 200 Area
45 ETF for treatment or transferred to another basin (or basins), whichever is faster. If necessary a
46 temporary pumping system may be installed to increase the transfer rate.

1 **C.5.4 Structural Integrity of Dikes**

2 The structural integrity of the dikes was certified attesting to the structural integrity of the dikes, signed
3 by a qualified, registered professional engineer.

4 **C.5.4.1 Dike Design, Construction, and Maintenance**

5 The dikes of the LERF are constructed of onsite native soils, generally consisting of cobbles and gravels.
6 Well-graded mixtures were specified, with cobbles up to 15 centimeters in the largest dimension, but not
7 constituting more than 20 percent of the volume of the fill. The dikes are designed with a 3:1 (3 units
8 horizontal to 1 unit vertical) slope on the basin side, and 2.25:1 on the exterior side. The dikes are
9 approximately 8.2 meters high from the bottom of the basin, and 3 meters above grade.

10 Calculations were performed to verify the structural integrity of the dikes (HNF 1997). The calculations
11 demonstrate that the structural strength of the dikes is such that, without dependence on any lining
12 system, the sides of the basins can withstand the pressure exerted by the maximum allowable quantity of
13 fluid in the impoundment. The dikes have a factor of safety greater than 2.5 against failure by sliding.

14 **C.5.4.2 Dike Stability and Protection**

15 In the following paragraphs, various aspects of stability for the LERF dikes and the concrete anchor wall
16 are presented, including slope failure, hydrostatic pressure, and protection from the environment.

17 **Failure in Dike/Impoundment Cut Slopes.** A slope stability analysis was performed to determine the
18 factor of safety against slope failure. The computer program 'PCSTABL5' from Purdue University, using
19 the modified Janbu Method, was employed to evaluate slope stability under both static and seismic
20 loading cases. One hundred surfaces per run were generated and analyzed. The assumptions used were
21 as follows (Chen-Northern 1991b):

- 22 • Weight of gravel: 2,160 kilograms per cubic meter
- 23 • Maximum dry density of gravel: 2,315 kilograms per cubic meter
- 24 • Mohr-Coulomb shear strength angle for gravel: minimum 33 degrees
- 25 • Weight of soil/bentonite: 1,600 kilograms per cubic meter
- 26 • Mohr-Coulomb shear strength angle for soil/bentonite: minimum 30 degrees
- 27 • Slope: 3 horizontal: 1 vertical
- 28 • No fluid in impoundment (worst case for stability)
- 29 • Soils at in-place moisture (not saturated conditions)

30 Results of the static stability analysis showed that the dike slopes were stable with a minimum factor of
31 safety of 1.77 (Chen-Northern 1991b).

32 The standard horizontal acceleration required in the *Hanford Plant Standards*, "Standard Architectural-
33 Civil Design Criteria, Design Loads for Facilities" (DOE-RL 1988), for structures on the Hanford Site is
34 0.12 g. Adequate factors of safety for cut slopes in units of this type generally are considered 1.5 for
35 static conditions and 1.1 for dynamic stability (Golder 1989). Results of the stability analysis showed that
36 the LERF basin slopes were stable under horizontal accelerations of 0.10 and 0.15 g, with minimum
37 factors of safety of 1.32 and 1.17, respectively (Chen-Northern 1991b). Printouts from the PCSTABL5
38 program are provided in *Calculations for Liquid Effluent Retention Facility Part B Permit Application*
39 (HNF 1997).

40 **Hydrostatic Pressure.** Failure of the dikes due to buildup of hydrostatic pressure, caused by failure of
41 the leachate system or liners, is very unlikely. The liner system is constructed with two essentially
42 impermeable layers consisting of a synthetic layer overlying a soil layer with low-hydraulic conductivity.
43 It would require a catastrophic failure of both liners to cause hydrostatic pressures that could endanger
44 dike integrity. Routine inspections of the leachate detection system, indicating quantities of leachate
45 removed from the basins, provide an early warning of leakage or operational problems that could lead to
46 excessive hydrostatic pressure. A significant precipitation event (e.g., a 25-year, 24-hour storm) will not
47 create a hydrostatic problem because the interior sidewalls of the basins are covered completely by the

1 liners. The covers can accommodate this volume of precipitation without overtopping the dike
2 (Section C.5.3), and the coarse nature of the dike and foundation materials on the exterior walls provides
3 for rapid drainage of precipitation away from the basins.

4 **Protection from Root Systems.** Risk to structural integrity of the dikes because of penetrating root
5 systems is minimal. Excavation and construction removed all vegetation on and around the
6 impoundments, and native plants (such as sagebrush) grow very slowly. The large grain size of the
7 cobbles and gravel used as dike construction material do not provide an advantageous germination
8 medium for native plants. Should plants with extending roots become apparent on the dike walls, the
9 plants will be controlled with appropriate herbicide application.

10 **Protection from Burrowing Mammals.** The cobble size materials that make up the dike construction
11 material and the exposed nature of the dike sidewalls do not offer an advantageous habitat for burrowing
12 mammals. Lack of vegetation on the LERF site discourages foraging. The risk to structural integrity of
13 the dikes from burrowing mammals is therefore minimal. Periodic visual inspections of the dikes provide
14 observations of any animals present. Should burrowing mammals be noted onsite, appropriate pest
15 control methods such as trapping or application of rodenticides will be employed.

16 **Protective Cover.** Approximately 7.6 centimeters of crushed gravel serve as the cover of the exterior
17 dike walls. This coarse material is inherently resistant to the effect of wind because of its large grain size.
18 Total annual precipitation is low (16 centimeters) and a significant storm event (e.g., a 25-year, 24-hour
19 storm) could result in about 5.3 centimeters of precipitation in a 24-hour period. The absorbent capacity
20 of the soil exceeds this precipitation rate; therefore, the impact of wind and precipitation run-on to the
21 exterior dike walls will be minimal.

22 **C.5.5 Piping Systems**

23 Aqueous waste from the 242-A Evaporator is transferred to the LERF using a pump located in the
24 242-A Evaporator and approximately 1,500 meters of pipe, consisting of a 3-inch carrier pipe within a
25 6-inch outer containment pipeline. Flow through the pump is controlled through a valve at flow rates
26 from 150 to 300 liters per minute. The pipeline exits the 242-A Evaporator below grade and remains
27 below grade at a minimum 1.2 meter depth for freeze protection, until the pipeline emerges at the LERF
28 catch basin, at the corner of each basin. All piping at the catch basin that is less than 1.2 meters below
29 grade is wrapped with electric heat tracing tape and insulated for protection from freezing.

30 The transfer line from the 242-A Evaporator is centrifugally cast, fiberglass-reinforced epoxy thermoset
31 resin pressure pipe fabricated to meet the requirements of ASME D2997 (ASME 1984). The 3-inch
32 carrier piping is centered and supported within 6-inch containment piping. Pipe supports are fabricated of
33 the same material as the pipe, and meet the strength requirements of ANSI B31.3 (ANSI 1987) for dead
34 weight, thermal, and seismic loads. A catch basin is provided at the northwest corner of each basin where
35 piping extends from the basin to allow for basin-to-basin and basin-to-200 Area ETF liquid transfers.
36 Drawing H-2-88766, Sheets 1 through 4, provide schematic diagrams of the piping system at LERF.
37 Drawing H-2-79604 provides details of the piping from the 242-A Evaporator to LERF.

38 **C.5.5.1 Secondary Containment System for Piping**

39 The 6-inch containment piping encases the 3-inch carrier pipe from the 242-A Evaporator to the LERF.
40 All of the piping and fittings that are not directly over a catch basin or a basin liner are of this pipe-
41 within-a-pipe construction. A catch basin is provided at the northwest corner of each basin where the
42 inlet pipes, leachate risers, and transfer pipe risers emerge from the basin. The catch basin consists of a
43 20-centimeter-thick concrete pad at the top of the dike. The perimeter of the catch basin has a
44 20-centimeter-high curb, and the concrete is coated with a chemical resistant epoxy sealant. The concrete
45 pad is sloped so that any leaks or spills from the piping or pipe connections will drain into the basin. The
46 catch basin provides an access point for inspecting, servicing, and operating various systems such as
47 transfer valving, leachate level instrumentation and leachate pump. Drawing H-2-79593 provides a
48 schematic diagram of the catch basins.

1 **C.5.5.2 Leak Detection System**

2 Single-point electronic leak detection elements are installed along the transfer line at 305-meter intervals.
3 The leak detection elements are located in the bottom of specially designed test risers. Each sensor
4 element employs a conductivity sensor, which is connected to a cable leading back to the 242-A
5 Evaporator control room. If a leak develops in the carrier pipe, fluid will travel down the exterior surface
6 of the carrier pipe or the interior of the containment pipe. As moisture contacts a sensor unit, a general
7 alarm sounds in the 242-A Evaporator and 200 Area ETF control rooms and the zone of the Sensor unit
8 causing the general alarm can be determined using the 242-
9 A Evaporator leak detection monitoring panel. Upon verification of a leak, the pump located in the 242-
10 A Evaporator is shut down, stopping the flow of aqueous waste through the transfer line. A low-volume
11 air purge of the annulus between the carrier pipe and the containment pipe is provided to prevent
12 condensation buildup and minimize false alarms by the leak detection elements.

13 The catch basins have conductivity leak detectors that alarm in the 242-A Evaporator and 200 Area ETF
14 control rooms. Leaks into the catch basins drain back to the basin through a 5.1-centimeter drain on the
15 floor of the catch basin.

16 **C.5.5.3 Certification**

17 Although an integrity assessment is not required for piping associated with surface impoundments, an
18 assessment of the transfer liner was performed, including a hydrostatic leak/pressure test at
19 10.5 kilograms per square centimeter gauge. A statement by an independent, qualified, registered
20 professional engineer attesting to the integrity of the piping system is included in *Integrity Assessment*
21 *Report for the 242-A Evaporator/LERF Waste Transfer Piping, Project W105* (WHC 1993), along with
22 the results of the leak/pressure test.

23 **C.5.6 Double Liner and Leak Detection, Collection, and Removal System**

24 The double-liner system for LERF is discussed in Section C.5.2. The leachate detection, collection, and
25 removal system (Figure C.18 and Figure C.19) was designed and constructed to remove leachate that
26 might permeate the primary liner. System components for each basin include:

- 27 • 30.5-centimeter layer of drainage gravel below the primary liner at the bottom of the basin
- 28 • Geonet below the primary liner on the sidewalls to direct leachate to the gravel layer
- 29 • 3.0-meter by 1.8-meter by 0.30-meter-deep leachate collection sump consisting of a 25 millimeter
30 high-density polyethylene flat stock, geotextile to trap large particles in the leachate, and
31 1.5-millimeter high-density polyethylene rub sheet set on the secondary liner
- 32 • 10-inch and 4-inch perforated leachate high-density polyethylene riser pipes from the leachate
33 collection sump to the catch basin northwest of the basin
- 34 • Leachate collection sump level instrumentation installed in the 4-inch riser
- 35 • Level sensors, submersible leachate pump, and 1.5-inch fiberglass-reinforced epoxy thermoset resin
36 pressure piping installed in the 10-inch riser
- 37 • Piping at the catch basin to route the leachate through 1.5-inch high-density polyethylene pipe back to
38 the basins

39 The bottom of the basins has a two percent slope to allow gravity flow of leachate to the leachate
40 collection sump. This exceeds the minimum of 1 percent slope required by [WAC 173-303-650\(j\)](#) for new
41 surface impoundments. Material specifications for the leachate collection system are given in
42 Section C.5.2.1.1.

43 Calculations demonstrate that fluid from a small hole (2 millimeter) (EPA 1989, p. 122) at the furthest
44 end of the basin, under a low head situation, would travel to the sump in less than 24 hours (HNF 1997).

1 Additional calculations indicate the capacity of the pump to remove leachate is sufficient to allow time to
2 readily identify a leak and activate emergency procedures (HNF 1997).

3 Automated controls maintain the fluid level in each leachate sump below 33 centimeters to prevent
4 significant liquid backup into the drainage layer. The leachate pump is activated when the liquid level in
5 the sump reaches about 28 centimeters, and is shut off when the sump liquid level reaches about
6 18 centimeters. This operation prevents the leachate pump from cycling with no fluid, which could
7 damage the pump. Liquid level control is accomplished with conductivity probes that trigger relays
8 selected specifically for application to submersible pumps and leachate fluids. A flow meter/totalizer on
9 the leachate return pipe measures fluid volumes pumped and pumping rate from the leachate collection
10 sumps, and indicates volume and flow rate on local readouts. Other instrumentation provided is real-time
11 continuous level monitoring with readout at the catch basin and the 242-A Evaporator control room. A
12 sampling port is provided in the leachate piping system at the catch basin. Leak detection is provided
13 through inspections of the leachate flow totalizer readings. For more information on inspections, refer to
14 Addendum I.

15 The stainless steel leachate pump is designed to deliver 110 liters per minute. The leachate pump returns
16 draw liquid from the sump via 1.5-inch pipe and discharges into the basin through 1.5-inch high-density
17 polyethylene pipe.

18 **C.5.7 Construction Quality Assurance**

19 The construction quality assurance plan and complete report of construction quality assurance inspection
20 and testing results are provided in *242-A Evaporator Interim Retention Basin Construction Quality*
21 *Assurance Plan* (KEH 1991). A general description of construction quality assurance procedures is
22 outlined in the following paragraphs.

23 For excavation of the basins and construction of the dikes, regular inspections were conducted to ensure
24 compliance with procedures and drawings, and compaction tests were performed on the dike soils.

25 For the soil/bentonite layer, test fills were first conducted in accordance with EPA guidance to
26 demonstrate compaction procedures and to confirm compaction and permeability requirements can be
27 met. The ratio of bentonite to soil and moisture content was monitored; lifts did not exceed
28 15 centimeters before compaction, and specific compaction procedures were followed. Laboratory and
29 field tests of soil properties were performed for each lift and for the completed test fill. The same suite of
30 tests was conducted for each lift during the laying of the soil/bentonite admixture in the basins.

31 Geotextiles and geomembranes were laid in accordance with detailed procedures and quality assurance
32 programs provided by the manufacturers and installers. These included destructive and nondestructive
33 tests on the geomembrane seams, and documentation of field test results and repairs.

34 **C.5.8 Proposed Action Leakage Rate and Response Action Plan**

35 An action leakage rate limit is established where action must be taken due to excessive leakage from the
36 primary liner. The action leak rate is based on the maximum design flow rate the leak detection system
37 can remove without the fluid head on the bottom liner exceeding 30 centimeters. The limiting factor in
38 the leachate removal rate is the hydraulic conductivity of the drainage gravel. An action leakage rate
39 (also called the rapid or large leak rate) of 20,000 liters per hectare per day was calculated for each basin
40 (WHC 1992b).

41 When it is determined that the action leakage rate has been exceeded, the response action plan will follow
42 the actions in [WAC 173-303-650\(11\)\(b\)](#) and (c), which includes notification of Ecology in writing
43 within 7 days, assessing possible causes of the leak, and determining whether waste receipt should be
44 curtailed and/or the basin emptied.

45 **C.5.9 Dike Structural Integrity Engineering Certification**

46 The structural integrity of the dikes was certified attesting to the structural integrity of the dikes, signed
47 by a qualified, registered professional engineer.

1 **C.5.10 Management of Ignitable, Reactive, or Incompatible Wastes**

2 Although ignitable or reactive aqueous waste might be received in small quantities at LERF, such
3 aqueous waste is mixed with dilute solutions in the basins, removing the ignitable or reactive
4 characteristics. For compatibility requirements with the LERF liner, refer to Addendum B, Waste
5 Analysis Plan.

6 **C.6 AIR EMISSIONS CONTROL**

7 This section addresses the 200 Area ETF requirements of Air Emission Standards for Process Vents,
8 under [40 CFR 264](#), Subpart AA ([WAC 173-303-690](#) incorporated by reference) and Subpart CC. The
9 requirements of [40 CFR 264](#), Subpart BB ([WAC 173-303-691](#)) is not applicable because aqueous waste
10 with 10 percent or greater organic concentration would not be acceptable for processing at the ETF.

11 **C.6.1 Applicability of Subpart AA Standards**

12 The 200 Area ETF evaporator and thin film dryer perform operations that specifically require evaluation
13 for applicability of [WAC 173-303-690](#). Aqueous waste in these units routinely contains greater than 10
14 parts per million concentrations of organic compounds and are, therefore, subject to air emission
15 requirements under [WAC 173-303-690](#). Organic emissions from all affected process vents on the
16 Hanford Facility must be less than 1.4 kilograms per hour and 2.8 mega grams per year, or control
17 devices must be installed to reduce organic emissions by 95 percent.

18 The vessel off gas system provides a process vent system. This system provides a slight vacuum on the
19 200 Area ETF process vessels and tanks (refer to Section C.2.5.2). Two vessel vent header pipes
20 combine and enter the vessel off gas system filter unit consisting of a demister, electric heater, prefilter,
21 high-efficiency particulate air filters, activated carbon absorber, and two exhaust fans (one fan in service
22 while the other is backup). The vessel off gas system filter unit is located in the high-efficiency
23 particulate air filter room west of the process area. The vessel off gas system exhaust discharges into the
24 larger building ventilation system, with the exhaust fans and stack located outside and immediately west
25 of the ETF. The exhaust stack discharge point is 15.5 meters above ground level.

26 The annual average flow rate for the 200 Area ETF stack (which is the combined vessel off gas and
27 building exhaust flow rates) is 1600 cubic meters per minute with a total annual flow of approximately
28 8.4 E+08 cubic meters. During waste processing, the airflow through just the vessel off gas system is
29 about 23 standard cubic meters per minute.

30 Organic emissions occur during waste processing, which occurs less than 310 days each year
31 (i.e., 85 percent operating efficiency). This operating efficiency represents the maximum annual
32 operating time for the ETF, as shutdowns are required during the year for planned maintenance outages
33 and for reconfiguring the 200 Area ETF to accommodate different aqueous waste.

34 **C.6.2 Process Vents - Demonstrating Compliance**

35 This section outlines how the 200 Area ETF complies with the requirements and includes a discussion of
36 the basis for meeting the organic emissions limits, calculations demonstrating compliance, and conditions
37 for reevaluation.

38 **C.6.2.1 Basis for Meeting Limits/Reductions**

39 The 242-A Evaporator and the 200 Area ETF are currently the only operating TSD units that contribute to
40 the Hanford Facility volatile organic emissions under [40 CFR 264](#), Subpart AA. The combined release
41 rate is currently well below the threshold of 1.4 kilograms per hour or 2,800 kilograms per year of volatile
42 organic compounds. As a result, the 200 Area ETF meets these standards without the use of air pollution
43 control devices.

44 The amount of organic emissions could change as waste streams are changed, or TSD units are brought
45 online or are deactivated. The organic air emissions summation will be re-evaluated periodically as
46 condition warrants. Operations of the TSD units operating under [40 CFR 264](#), Subpart AA, will be

1 controlled to maintain Hanford Facility emissions below the threshold limits or pollution control device(s)
2 will be added, as necessary, to achieve the reduction standards specified under [40 CFR 264](#), Subpart AA.

3 **C.6.2.2 Demonstrating Compliance**

4 Calculations to determine organic emissions are performed using the following assumptions:

- 5 • Maximum flow rate from LERF to 200 Area ETF is 568 liters per minute.
- 6 • Emissions of organics from tanks and vessels upstream of the UV/OX process are determined from
7 flow and transfer rates given in *Clean Air Act Requirements, WAC 173-400, As-built Documentation,*
8 *Project C-018H, 242-A Evaporator/PUREX Plant Process Condensate Treatment Facility*
9 *(Adtechs 1995).*
- 10 • UV/OX reaction rate constants and residence times are used to determine the amount of organics,
11 which are destroyed in the UV/OX process. These constants are given in *200 Area Effluent*
12 *Treatment Facility Delisting Petition* (DOE/RL 1992).
- 13 • All organic compounds that are not destroyed in the UV/OX process are assumed to be emitted from
14 the tanks and vessels into the vessel off gas system.
- 15 • No credit for removal of organic compounds in the vessel off gas system carbon absorber unit is
16 taken. The activated carbon absorbers are used if required to reduce organic emissions.

17 The calculation to determine organic emissions consists of the following steps:

- 18 1. Determine the quantity of organics emitted from the tanks or vessels upstream of the UV/OX process,
19 using transfer rate values
- 20 2. Determine the concentration of organics in the waste after the UV/OX process using UV/OX reaction
21 rates and residence times. If the 200 Area ETF is configured such that the UV/OX process is not
22 used, a residence time of zero is used in the calculations (i.e., none of the organics are destroyed)
- 23 3. Assuming all the remaining organics are emitted, determine the rate which the organics are emitted
24 using the feed flow rate and the concentrations of organics after the UV/OX process
- 25 4. The amount of organics emitted from the vessel off gas system is the sum of the amount
26 calculated in steps 1 and 3.

27 The organic emission rates and quantity of organics emitted during processing are determined using these
28 calculations and are included in the Hanford Facility Operating Record, LERF and 200 Area ETF file.

29 **C.6.2.3 Reevaluating Compliance with Subpart AA Standards**

30 Calculations to determine compliance with Subpart AA will be reviewed when any of the following
31 conditions occur at the 200 Area ETF:

- 32 • Changes in the maximum feed rate to the 200 Area ETF (i.e., greater than the 568 liters per minute
33 flow rate)
- 34 • Changes in the configuration or operation of the 200 Area ETF that would modify the assumptions
35 given in Section C.6.2.2 (e.g., taking credit for the carbon absorbers as a control device)
- 36 • Annual operating time exceeds 310 days.

37 **C.6.3 Applicability of Subpart CC Standards**

38 The air emission standards of [40 CFR 264](#), Subpart CC apply to tank, surface impoundment, and
39 container storage units that manage wastes with average volatile organic concentrations equal to or
40 exceeding 500 parts per million by weight, based on the hazardous waste composition at the point of
41 origination (61 FR 59972). However, TSD units that are used solely for management of mixed waste are
42 exempt. Mixed waste is managed at the LERF and 200 Area ETF and dangerous waste could be treated
43 and stored at these TSD units.

1 TSD owner/operators are not required to determine the concentration of volatile organic compounds in a
2 hazardous waste if the wastes are placed in waste management units that employ air emission controls
3 that comply with the Subpart CC standards. Therefore, the approach to Subpart CC compliance at the
4 LERF and 200 Area ETF is to demonstrate that the LERF and 200 Area ETF meet the Subpart CC control
5 standards ([40 CFR 264.1084](#) – [40 CFR 264.1086](#)).

6 **C.6.3.1 Demonstrating Compliance with Subpart CC for Tanks**

7 Since the 200 Area ETF tanks already have process vents regulated under [40 CFR 264](#), Subpart AA
8 ([WAC 173-303-690](#)), they are exempt from Subpart CC [[40 CFR 264.1080\(b\)\(8\)](#)].

9 **C.6.3.2 Demonstrating Compliance with Subpart CC for Containers**

10 Container Level 1 and Level 2 standards are met at the 200 Area ETF by managing all dangerous and/or
11 mixed wastes in U.S. Department of Transportation containers [[40 CFR 264.1086\(f\)](#)]. Level 1 containers
12 are those that store more than 0.1 cubic meters and less than or equal to 0.46 cubic meters. Level 2
13 containers are used to store more than 0.46 cubic meters of waste, which are in 'light material service'.
14 Light material service is defined where a waste in the container has one or more organic constituents
15 with a vapor pressure greater than 0.3 kilopascals at 20 C, and the total concentration of such
16 constituents is greater than or equal to 20 percent by weight.

17 The monitoring requirements for Level 1 and Level 2 containers include a visual inspection when the
18 container is received at the 200 Area ETF and when the waste is initially placed in the container.
19 Additionally, at least once every 12 months when stored onsite for 1 year or more, these containers must
20 be inspected.

21 If compliant containers are not used at the 200 Area ETF, alternate container management practices are
22 used that comply with the Level 1 standards. Specifically, the Level 1 standards allow for a "container
23 equipped with a cover and closure devices that form a continuous barrier over the container openings such
24 that when the cover and closure devices are secured in the closed position there are no visible holes, gaps,
25 or other open spaces into the interior of the container. The cover may be a separate cover installed on the
26 container...or may be an integral part of the container structural design..." [[40 CFR 264.1086\(c\)\(1\)\(ii\)](#)].
27 An organic-vapor-suppressing barrier, such as foam, may also be used [[40 CFR 264.1086\(c\)\(1\)\(iii\)](#)].
28 Section C.3 provides detail on container management practices at the 200 Area ETF.

29 Container Level 3 standards apply when a container is used for the "treatment of a hazardous waste by a
30 waste stabilization process" [[40 CFR 264.1086\(2\)](#)]. Because treatment in containers using the
31 stabilization process is not provided at the 200 Area ETF, these standards do not apply.

32 **C.6.3.3 Demonstrating Compliance with Subpart CC for Surface Impoundments**

33 The Subpart CC emission standards are met at LERF using a floating membrane cover that is constructed
34 of very-low-density polyethylene that forms a continuous barrier over the entire surface area
35 [[40 CFR 264.1085\(c\)](#)]. This membrane has both organic permeability properties equivalent to a high-
36 density polyethylene cover and chemical/physical properties that maintain the material integrity for the
37 intended service life of the material. The additional requirements for the floating cover at the LERF have
38 been met (Section C.5.2.4).

39 **C.7 ENGINEERING DRAWINGS**

40 **C.7.1 Liquid Effluent Retention Facility**

41 Drawings of the containment systems at the LERF are summarized in Table C.1. Because the failure of
42 these containment systems at LERF could lead to the release of dangerous waste into the environment,
43 modifications that affect these containment systems will be submitted to the Washington State
44 Department of Ecology, as a Class 1, 2, or 3 Permit modification, as required by [WAC 173-303-830](#).

Table C.1. Liquid Effluent Retention Facility Containment System

| LERF System | Drawing Number | Drawing Title |
|--------------|-------------------------|---|
| Bottom Liner | H-2-79590, Sheet 1 | Civil Plan, Sections and Details; Cell Basin Bottom Liner |
| Top Liner | H-2-79591, Sheet 1 | Civil Plan, Sections and Details; Cell Basin Bottom Liner |
| Catch Basin | H-2-79593, Sheet 1, 3-5 | Civil Plan, Section and Details; Catch Basin |

The drawings identified in Table C.2 illustrate the piping and instrumentation configuration within LERF, and of the transfer piping systems between the LERF and the 242-A Evaporator. These drawings are provided for general information and to demonstrate the adequacy of the design of the LERF as a surface impoundment.

Table C.2. Liquid Effluent Retention Facility Piping and Instrumentation

| LERF System | Drawing Number | Drawing Title |
|-------------------------------------|--------------------|---|
| Transfer Piping to 242-A Evaporator | H-2-79604, Sheet 1 | Piping Plot and Key Plans; 242-A Evaporator Condensate Stream |
| LERF Piping and Instrumentation | H-2-88766, Sheet 1 | P&ID; LERF Basin and ETF Influent |
| | H-2-88766, Sheet 2 | P&ID; LERF Basin and ETF Influent |
| | H-2-88766, Sheet 3 | P&ID; LERF Basin and ETF Influent |
| | H-2-88766, Sheet 4 | P&ID; LERF Basin and ETF Influent |
| Legend | H-2-89351, Sheet 1 | Piping & Instrumentation Diagram - Legend |

C.7.2 200 Area Effluent Treatment Facility

Drawings of the secondary containment systems for the 200 Area ETF containers, and tanks and process units, and for the Load-In Tanks are summarized in Table C.3. Because the failure of the secondary containment systems could lead to the release of dangerous waste into the environment, modifications, which affect the secondary containment systems, will be submitted to the Washington State Department of Ecology, as a Class 1, 2, or 3 Permit modification, as required by [WAC 173-303-830](#).

Table C.3. Effluent Treatment Facility and Load-In Station Secondary Containment Systems

| 200 Area ETF Process Unit | Drawing Number | Drawing Title |
|--|---------------------|--|
| Surge Tank, Process/ Container Storage Areas and Trenches - Foundation and Containment | H-2-89063, Sheet 1 | Architectural/structural – Foundation and Grade Beam Plan |
| Sump Tank Containment | H-2-89065, Sheet 1 | Architectural/structural – Foundation, Sections and Detail |
| Verification Tank Foundation and Containment | H-2-89068, Sheet 1 | Architectural/structural – Verification Tank Foundation |
| Load-In Facility Foundation and Containment | H-2-817970, Sheet 1 | Structural – ETF Truck Load-in Facility Plans and Sections |
| Load-In Facility Foundation and Containment | H-2-817970, Sheet 2 | Structural – ETF Truck Load-in Facility Sections and Details |

The drawings identified in Table C.4 provide an illustration of the piping and instrumentation configuration for the major process units and tanks at the ETF, and the Load-In Tanks. Drawings of the transfer piping systems between the LERF and 200 Area ETF, and between the Load-In Station and the 200 Area ETF also are presented in this table. These drawings are provided for general information and to demonstrate the adequacy of the design of the tank systems.

1 **Table C.4. Major Process Units and Tanks at the Effluent Treatment Facility and Load-In**
2 **Station**

| 200 Area ETF Process Unit | Drawing Number | Drawing Title |
|--|---------------------|--|
| Load-In Facility | H-2-817974, Sheet 1 | P&ID – ETF Truck Load-In Facility |
| Load-In Facility | H-2-817974, Sheet 2 | P&ID – ETF Truck Load-In Facility |
| Surge Tank | H-2-89337, Sheet 1 | P&ID – Surge Tank System |
| UV/Oxidation | H-2-88976, Sheet 1 | P&ID – UV Oxidizer Part 1 |
| UV/Oxidation | H-2-89342, Sheet 1 | P&ID – UV Oxidizer Part 2 |
| Reverse Osmosis | H-2-88980, Sheet 1 | P&ID – 1st RO Stage |
| Reverse Osmosis | H-2-88982, Sheet 1 | P&ID – 2nd RO Stage |
| IX/Polishers | H-2-88983, Sheet 1 | P&ID – Polisher |
| Verification Tanks | H-2-88985, Sheet 1 | P&ID – Verification Tank System |
| ETF Evaporator | H-2-89335, Sheet 1 | P&ID – Evaporator |
| Thin Film Dryer | H-2-88989, Sheet 1 | P&ID – Thin Film Dryer |
| Transfer Piping from LERF to ETF | H-2-88768, Sheet 1 | Piping Plan/Profile 4"– 60M-002-M17 and 3"–60M-001-M17 |
| Transfer Piping from Load-In Facility to ETF | H-2-817969, Sheet 1 | Civil – ETF Truck Load-In Facility Site Plan |

3

1 **Table C.5. 200 Area Effluent Treatment Facility Tank Systems Information**

| Tank Description | Material of Construction | Maximum Tank Capacity ¹ liters | Inner diameter meters | Height meters | Shell Thickness ² centimeters | Corrosion Protection ³ |
|--------------------------------------|--------------------------------|---|-----------------------------------|---------------|--|-----------------------------------|
| Load-in tanks 59A-TK-109/-117 (2) | 304 SS | 34,350 | 3.6 | 4.7 | 0.64 | Type 304 SS |
| Load-in tank 59A-TK-1 | FRP | 26,000 | 3.0 | 3.8 | 0.48 (dome) 0.63 (walls & bottom) | FRP |
| Surge tank | 304 SS | 462,000 | 7.9 | 9.2 | 0.48 | Type 304 SS |
| pH adjustment tank | 304 SS | 16,700 | 3.0 | 2.5 | 0.64 | Type 304 SS |
| First RO feed tank | 304 SS | 20,600 | 3.0 | 3.2 | 0.64 | Type 304 SS |
| Second RO feed tank | 304 SS | 9,000 | Nonround tank 3.0 m x 1.5 m | 1.5 | 0.48 w/rib stiffeners | Type 304 SS |
| Effluent pH adjustment tank | 304 SS | 14,400 | 2.4 | 3.6 | 0.64 | Type 304 SS |
| Verification tanks (3) | Carbon steel with epoxy lining | 3,000,000 | 18.3 | 11.4 | 0.79 | epoxy coating |
| Secondary waste receiving tanks (2) | 304 SS | 73,800 | 4.3 | 5.7 | 0.64 | Type 304 SS |
| Concentrate tanks (2) | 316L SS | 24,900 | 3.0 | 3.8 | 0.64 | Type 316 SS |
| ETF evaporator (Vapor Body) | Alloy 625 | 20,000 | 2.4 | 6.8 | variable | Alloy 625 |
| Distillate flash tank | 304 SS | 950 | Horizontal tank 0.76 | Length 2.2 | 0.7 | 304 SS |
| Sump tank 1 | 304 SS | 6,900 | 1.5 x 1.5 | 3.4 | 0.48 | 304 SS |
| Sump tank 2 | 304 SS | 6,700 | 1.5 x 1.5 | 3.4 | 0.48 | 304 SS |

2 ¹The maximum operating volume of the tanks is identified.
3 ²The nominal thickness of ETF tanks is represented.
4 ³Type 304 SS, 304L, 316 SS and alloy 625 provide corrosion protection.
5 304 SS = stainless steel type 304 or 304L.
6 316L SS = stainless steel type 316L
7 FRP = Fiberglass-reinforced plastic.
8

1 **Table C.6. 200 Area Effluent Treatment Facility Additional Tank System Information**

| Tank Description | Liner Materials | Pressure Controls | Foundation Materials | Structural Support | Seams | Connections |
|--|-----------------|---|--|--|--------|-------------|
| Load-in tanks 59A-TK-109/-117 (2) | None | vent to atmosphere | concrete slab | SS skirt bolted to concrete | welded | flanged |
| Load-in tank 59A-TK-1 | None | vent to atmosphere | concrete slab | bolted to concrete | none | flanged |
| Surge tank | None | vacuum breaker valve/vent to VOG | reinforced concrete ring plus concrete slab | structural steel on concrete base | welded | flanged |
| pH adjustment tank | None | vent to VOG | concrete slab | carbon steel skirt | welded | flanged |
| First RO feed tank | None | vent to VOG | concrete slab | carbon steel skirt | welded | flanged |
| Second RO feed tank | None | vent to VOG | concrete slab | carbon steel frame | welded | flanged |
| Effluent pH adjustment tank | None | vent to VOG | concrete slab | carbon steel skirt | welded | flanged |
| Verification tanks (3) | Epoxy | filtered vent to atmosphere | reinforced concrete ring plus concrete slab | structural steel on concrete base | welded | flanged |
| Secondary waste receiving tanks (2) | None | vent to VOG | concrete slab | carbon steel skirt | welded | flanged |
| Concentrate tanks (2) | None | vent to VOG | concrete slab | carbon steel skirt | welded | flanged |
| ETF evaporator (vapor body) | None | pressure indicator/pressur e relief valve vapor vent to DFT/VOG | concrete slab | carbon steel frame | welded | flanged |
| Distillate flash tank | None | Pressure relief valve/vent to vent gas cooler/VOG | concrete slab | carbon steel I-beam and cradle | welded | flanged |
| Sump tank 1 | None | vent to VOG | concrete containment | reinforced concrete containment basin | welded | flanged |
| Sump tank 2 | None | vent to VOG | concrete containment | reinforced concrete containment basin | welded | flanged |

- 2 DFT = distillate flash tank
- 3 VOG = vessel off gas system
- 4

1

Table C.7. Ancillary Equipment and Material Data

| System | Ancillary Equipment | Number | Material |
|---------------------------------|------------------------------------|--------------------------------------|--|
| Load-in tanks | Load-in/transfer pumps (2) | 2025ED-P-103A/-103B | 316 SS |
| | | 2025ED-P-001A/-001B | Cast iron |
| | Load-in filters (6) | 59A-FL-001/-002/-003/ -004/-005/-006 | 304 SS |
| Surge tank | Surge tank pumps (3) | 2025E-60A-P-1A/-1B/-1C | 304 SS |
| Rough filter | Rough filter | 2025E-60B-FL-1 | 304 SS |
| UV/OX | UV oxidation inlet cooler | 2025E-60B-E-1 | 316 SS |
| | UV oxidizers (4) | 2025E-60D-UV-1A/-1B/-2A/-2B | 316 SS |
| pH adjustment | pH adjustment pumps (2) | 2025E-60C-P-1A/-1B | 304 SS |
| Peroxide decomposer | H2O2 decomposers (2) | 2025E-60D-CO-1A/-1B | CS with epoxy coating |
| Fine filter | Fine filter | 2025E-60B-FL-2 | 304 SS |
| Degasification | Degasification column inlet cooler | 2025E-60E-E-1 | 316 SS |
| | Degasification column | 2025E-60E-CO-1 | FRP |
| | Degasification pumps (2) | 2025E-60E-P-1A/-1B | 316 SS |
| RO | Feed/booster pumps (6) | 2025E-60F-P-1A/-1B/-2A/-2B/-3A/-3B | 304 SS |
| | Reverse osmosis arrays (21) | 2025E-60F-RO-01 through -21 | Membranes: polyamide Outer piping: 304 SS |
| IX/Polishers | Polishers (3) | 2025E-60G-IX-1A/-1B-1C | CS with epoxy coating |
| | Resins strainers (3) | 2025E-60G-S-1A/-1B/-1C | 304 SS |
| Effluent pH adjustment | Recirculation/transfer pumps (2) | 2025E-60C-P-2A/-2B | 304 SS/PVC |
| Verification tanks | Return pump | 2025E-60H-P-1 | 304 SS |
| | Transfer pumps (2) | 2025E-60H-P-2A/-2B | |
| Secondary waste receiving tanks | Secondary waste feed pumps (2) | 2025E-60I-P-1A/-1B | 304 SS |
| ETF evaporator system | Feed/distillate heat exchanger | 2025E-60I-E-02 | Tubes: 316 SS Shell: 304 SS |
| | Heater (reboiler) | 2025E-60I-E-01 | Tubes: alloy 625 Shell: 304 SS |
| | Recirculation pump | 2025E-60I-P-02 | 316 SS |
| | Concentrate transfer pump | 2025E-60I-P-04 | 316 SS |
| | Entrainment separator | 2025E-60I-DE-01 | Top section: 316 SS Bottom section: alloy 625 |
| | Vapor compressor (incl. silencers) | 2025E-60I-C-01 | 304 SS |
| | Silencer drain pump | 2025E-60I-P-06 | 316 SS |
| | Level control tank | 2025E-60I-TK-5 | 304 SS |
| | Distillate flash tank pump | 2025E-60I-P-03 | 316 SS |
| | Concentrate tanks | Concentrate circulation pumps (2) | 2025E-60J-P-1A/-1B |
| Thin film dryer | Concentrate feed pump | 2025E-60J-P-2 | 316 SS |
| | Thin film dryer | 2025E-60J-D-1 | Interior surfaces: alloy 625 Rotor and blades: 316 SS |
| | Powder hopper | 2025E-60J-H-1 | 316 SS |
| | Spray condenser | 2025E-60J-DE-01 | 316 SS |
| | Distillate condenser | 2025E-60J-CND-01 | Tubes: 304 SS Shell: CS |
| | Dryer distillate pump | 2025E-60J-P-3 | 316 SS |
| | Resin dewatering | Dewatering pump | 2025E-80E-P-1 |

1

Table C.8. Concrete and Masonry Coatings

| Location | Product Name | Applied Film Thickness, Estimated |
|--|---|-----------------------------------|
| ETF Process and Container Storage Areas | | |
| Floor: Topcoat | Steelcote Floor-Nu Finish ¹ | 2 coats at 10-12 mils |
| Floor: Primer | Steelcote Monomid Hi-Build ¹ | 2.0 mils |
| Walls to 7 feet, Doors & Jambs | Chemproof PermaCoat 4000 Vertical ² | 2 coats at 12-16 mils |
| Load-in Station Tank Pit | | |
| Floor and Walls | Ameron Amercoat 351 ³ | 2 coats at 8.0-12 mils |
| Surge Tank and Verification Tank Berms | | |
| Floors (and Walls at Surge Tank): Topcoat | KCC Corrosion Control Elasti-Liner I ⁴ | 80 mils |
| Floors (and Walls at Surge Tank): Primer | KCC Corrosion Control Techni-Plus E3 ⁴ | 5.0-7.0 mils |

2 ¹Floor-Nu Finish and Monomid Hi-Build are trademarks of Steelcote Manufacturing, Incorporated

3 ²PermaCoat is a trademark of Chemproof Polymers, Incorporated

4 ³Amercoat is a trademark of Ameron International, Incorporated

5 ⁴Elasti-Liner and Techni-Plus are trademarks of KCC Corrosion Control, Incorporated

6

Table C.9. Geomembrane Material Specifications

| Property | Value |
|--|--|
| Specific gravity | 0.932 to 0.950 |
| Melt flow index | 1.0 g/10 min., maximum |
| Thickness (thickness of flow marks shall not exceed 200% of the nominal liner thickness) | 60 mil 310% (1.5 mm 3 10%) |
| Carbon black content | 1.8 to 3%, bottom liner 2 to 3% top liner |
| Tensile properties (each direction) | |
| Tensile strength at yield | 21.5 kgf/cm width, minimum |
| Tensile strength at break | 32.2 kgf/cm width, minimum |
| Elongation at yield | 10%, minimum |
| Elongation at break | 500%, minimum |
| Tear resistance | 13.6 kgf, minimum |
| Puncture resistance | 31.3 kgf, minimum |
| Low temperature/brittleness | -400 C, maximum |
| Dimensional (%change each direction) | 32%, maximum |
| Environmental stress crack | 750 h, minimum |
| Water absorption | 0.1 maximum and weight change |
| Hydrostatic resistance | 316,000 kgf/m ² |
| Oxidation induction time (200 C/l atm. O ₂) | 90 minutes |

7 Reference: Construction Specifications (KEH 1990b). Format uses NSF 54 table for high-density
8 polyethylene as a guide (NSF 1985). However, RCRA values for dimensional stability and environmental
9 stress crack have been added.

10 % = percent

max = maximum

11 g = gram

kgf = kilograms force

12 min = minute

m = meters

13 h = hour

mm = millimeters

14

1

Table C.10. Drainage Gravel Specifications

| Property | Value |
|-------------------|----------------------|
| Sieve size | |
| 25 millimeters | 100 wt% passing |
| 19 millimeters | 80 – 100 wt% passing |
| 9.5 millimeters | 10 – 40 wt% passing |
| 4.75 millimeters | 0 – 4 wt% passing |
| Permeability | 0.1 cm/sec, minimum |

2

Reference: Sieve size is from WSDOT M41-10-88, Section 9.03.1(3)C for Grading No. 5 (WSDOT 1988).

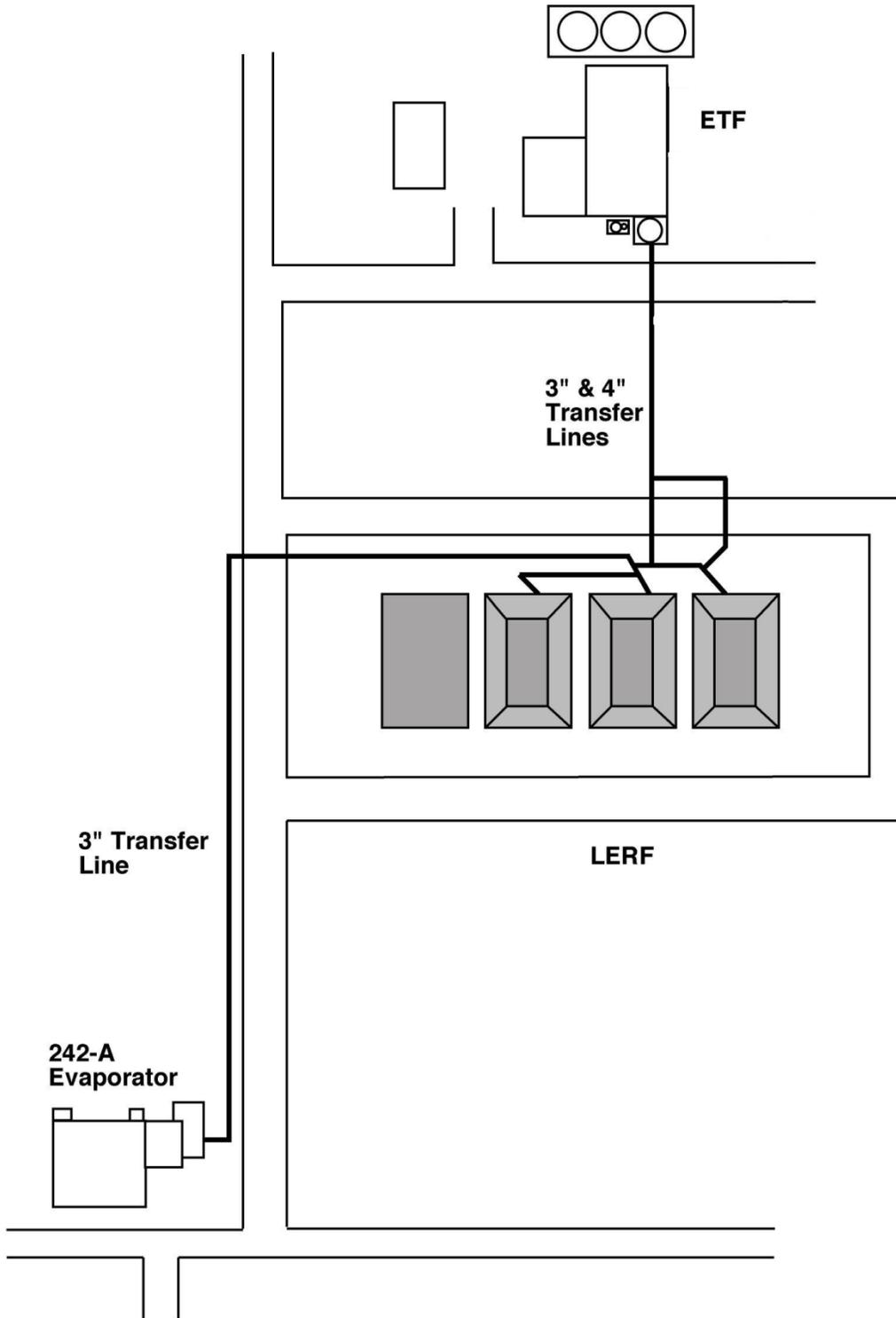
3

Permeability requirement is from [WAC 173-303-650\(2\)\(j\)](#) for new surface impoundments.

4

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Figure C.1. Liquid Effluent Retention Facility Layout

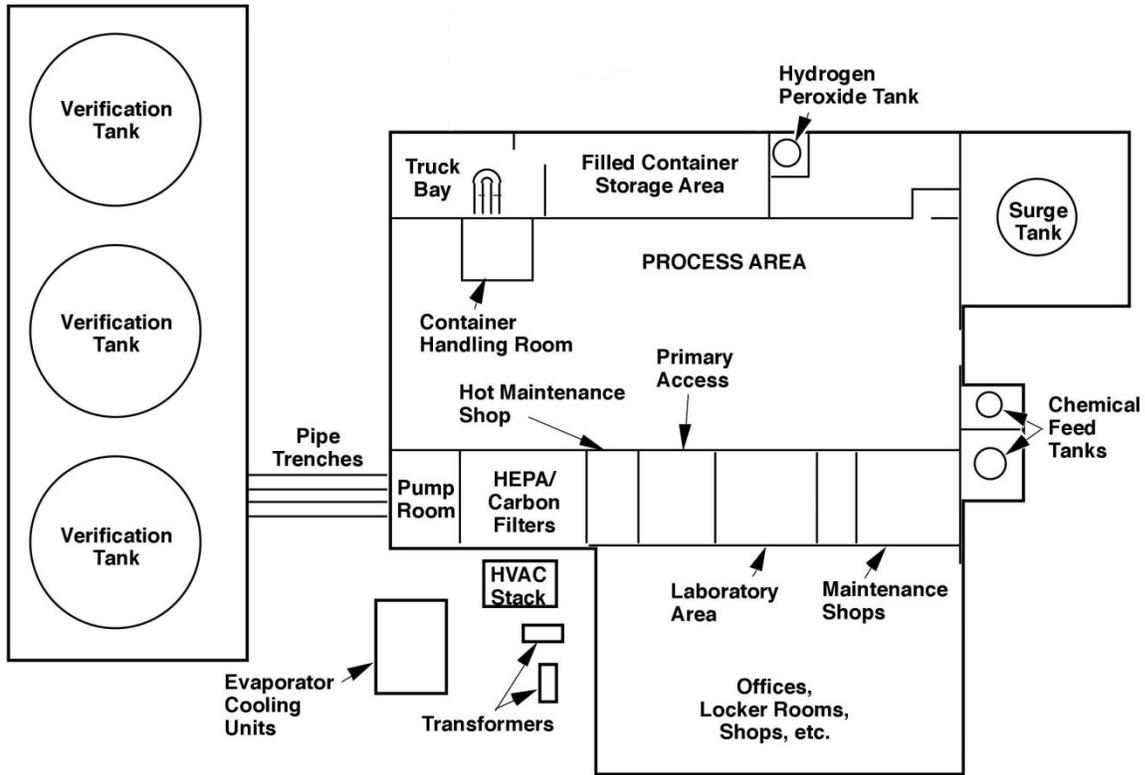


ETF = Effluent Treatment Facility
LERF = Liquid Effluent Retention Facility

M0704-3.5
4-21-07

1

Figure C.2. Plan View of the 200 Area Effluent Treatment Facility



HEPA = High-efficiency particulate air
HVAC = Heating, ventilation, and air conditioning

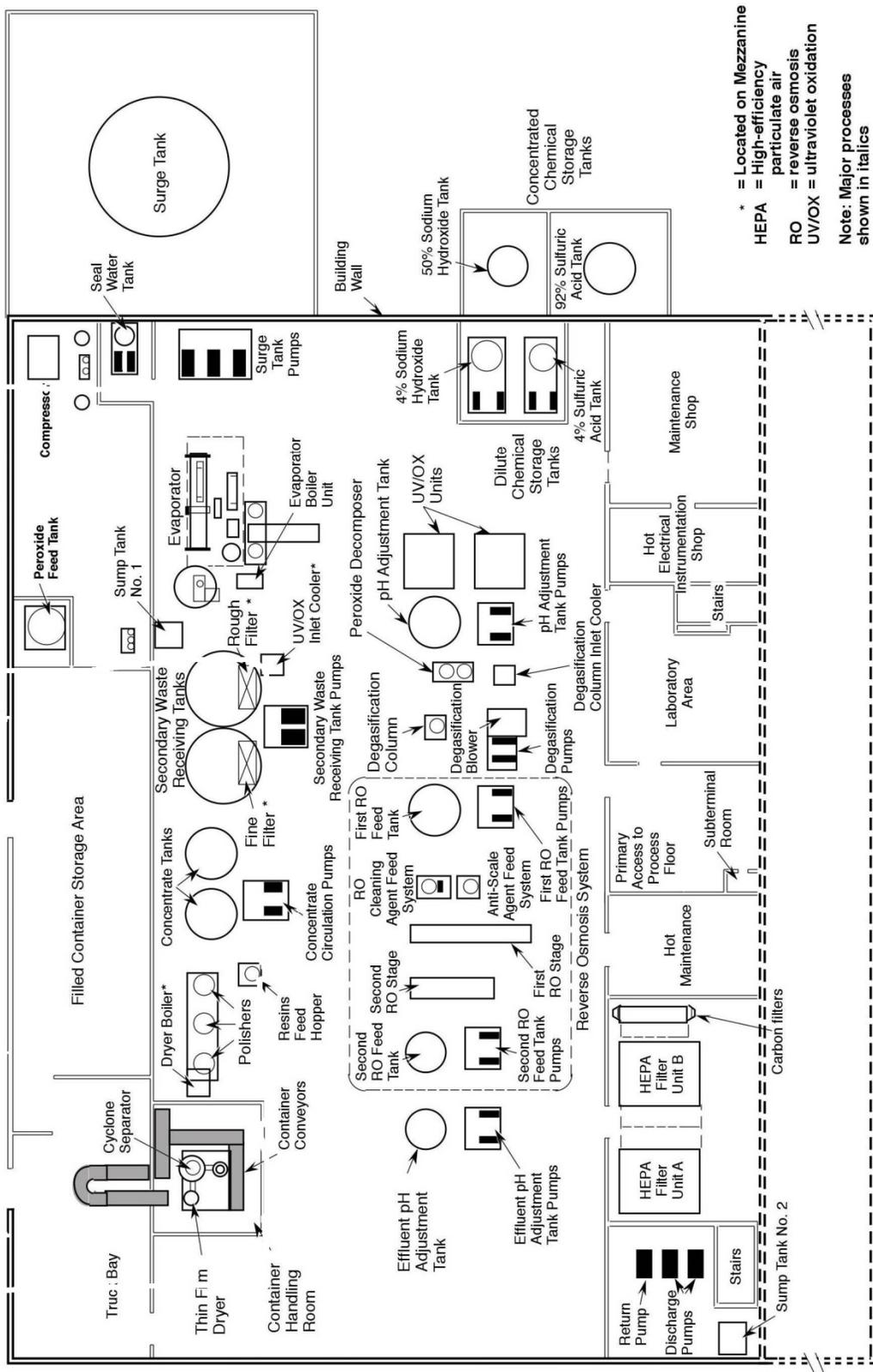
M0704-3.6
4-24-07

2

3

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3

Figure C.3. 200 Area Effluent Treatment Facility Layout

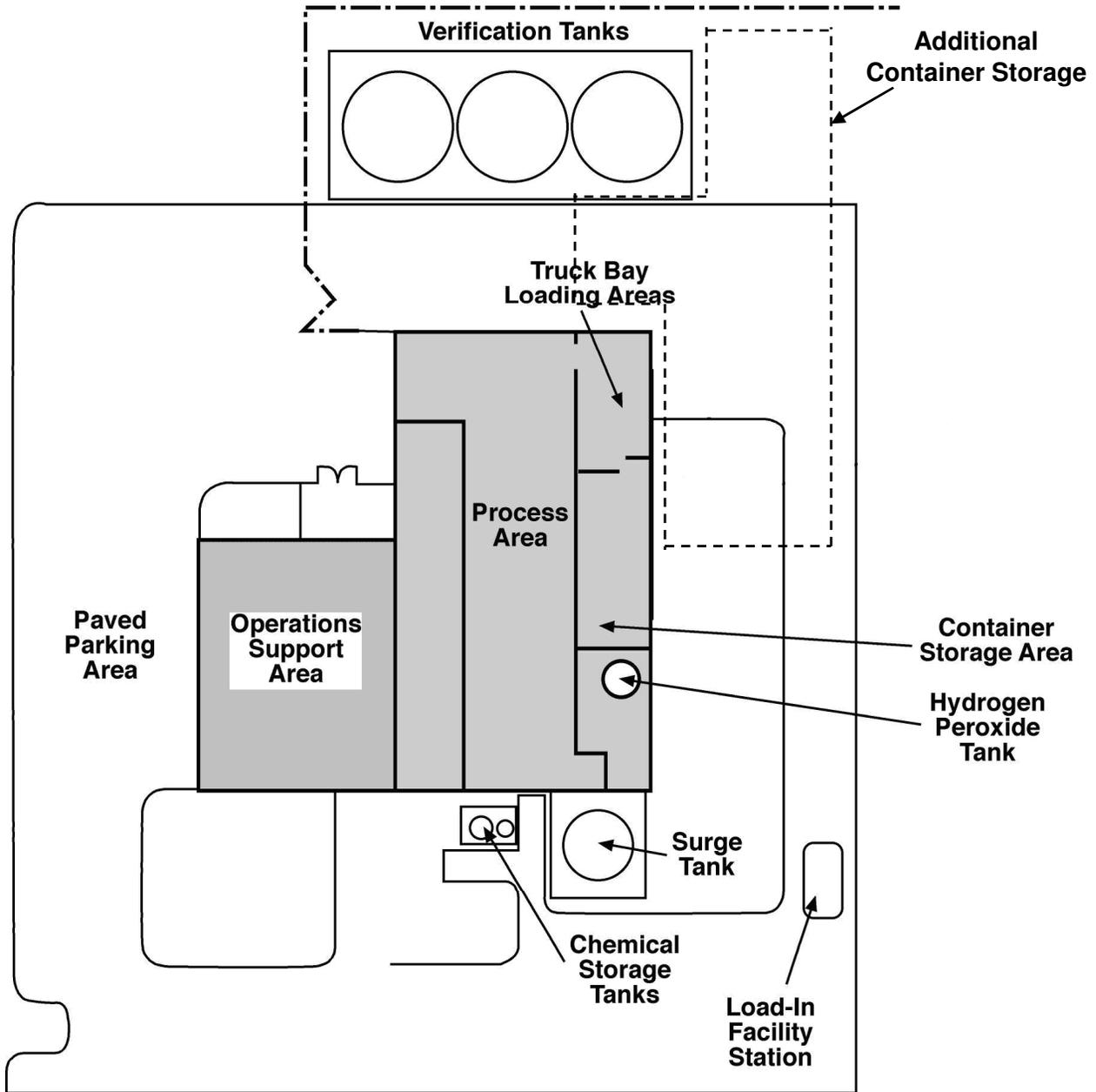


* = Located on Mezzanine
HEPA = High-efficiency particulate air
RO = reverse osmosis
UV/OX = ultraviolet oxidation
Note: Major processes shown in *italics*

M0704-3.1
4-21-07

1

Figure C.4. 200 Area Effluent Treatment Facility

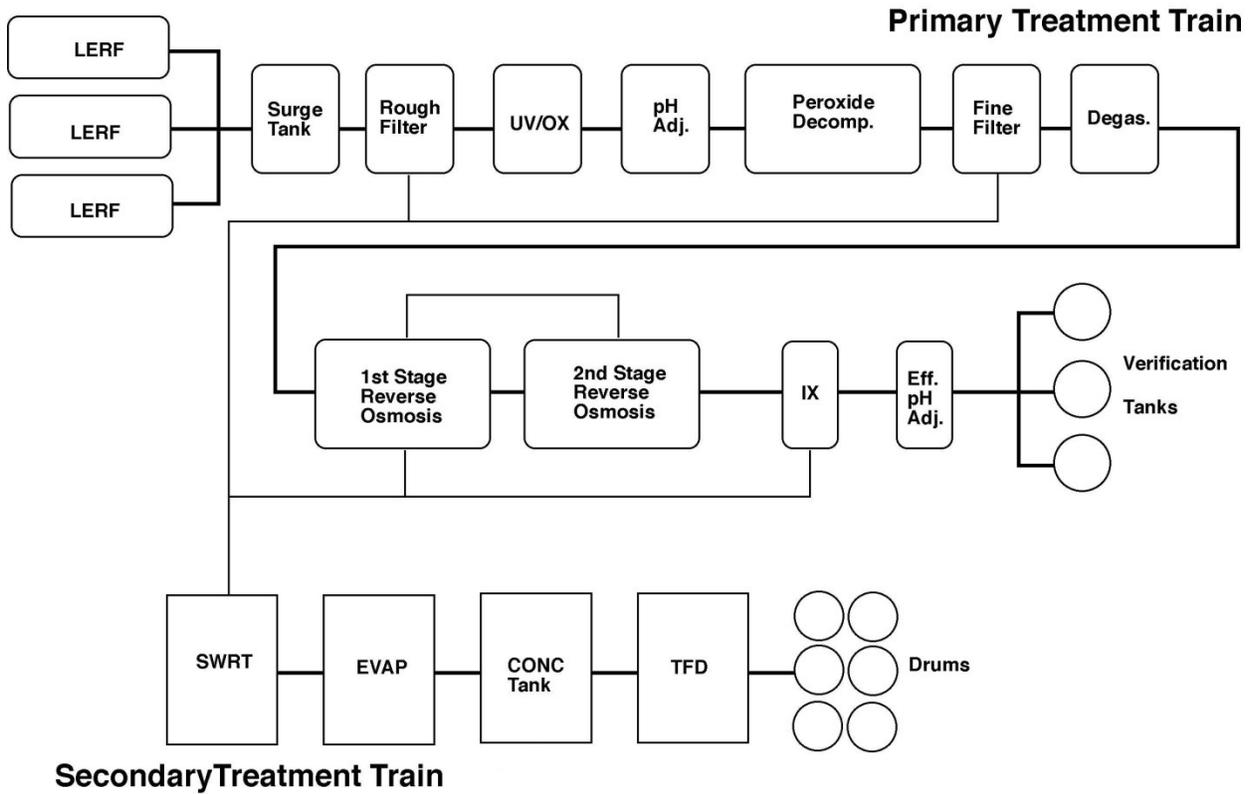


2

3

M0704-3.4
4-21-07

1 **Figure C.5. Example - 200 Area Effluent Treatment Facility Configuration 1**



- CONC Tank = Concentrate tank
- Degas. = Degasification column
- Eff. pH Adj. = Effluent pH adjustment tank
- EVAP = Evaporator
- IX = Ion Exchange
- LERF = Liquid Effluent Retention Facility
- pH Adj. = pH adjustment tank
- SWRT = Secondary waste receiving tank
- TFD = Thin film dryer
- UV/OX = Ultraviolet Oxidation

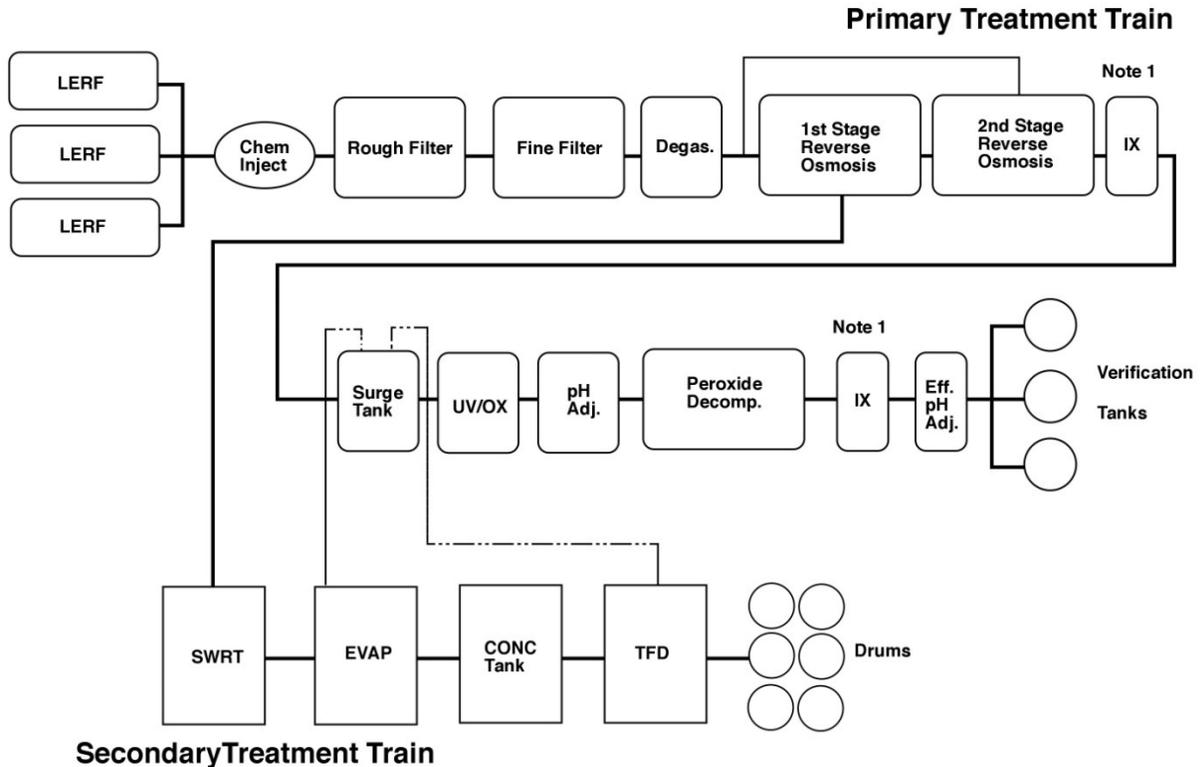
M0704-3.8
4-21-07

2

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2
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Figure C.6. Example - 200 Area Effluent Treatment Facility Configuration 2

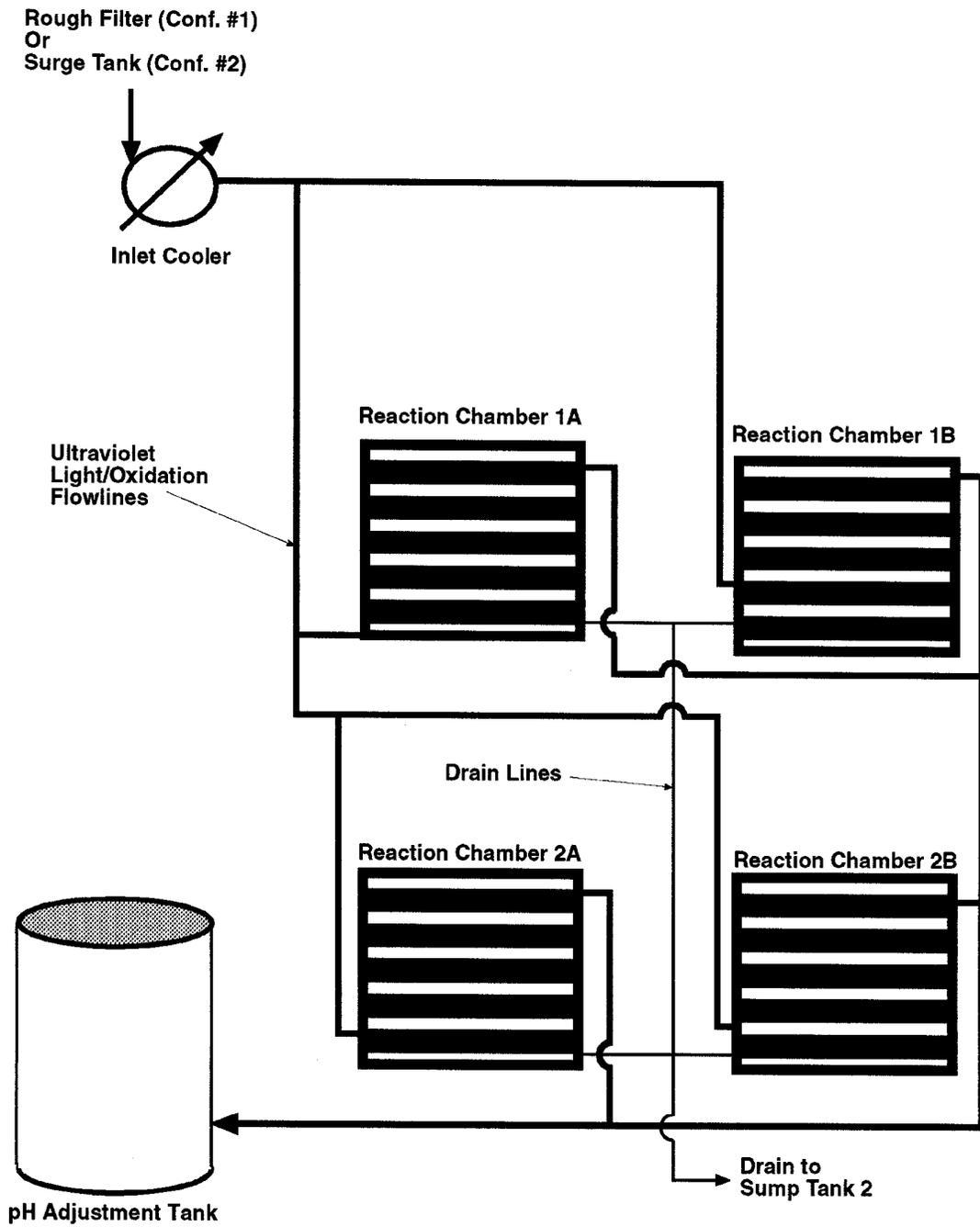


- Note1:** IX can be in either location
CONC Tank = Concentrate tank
Degas. = Degasification column
Eff. pH Adj. = Effluent pH adjustment tank
Evap = Evaporator
IX = Ion exchange
pH Adj. = pH adjustment tank
SWRT = Secondary waste receiving tank
TFD = Thin film dryer
UV/OX = Ultraviolet Oxidation

M0704-3.2
4-21-07

1

Figure C.8. Ultraviolet Light/Oxidation Unit



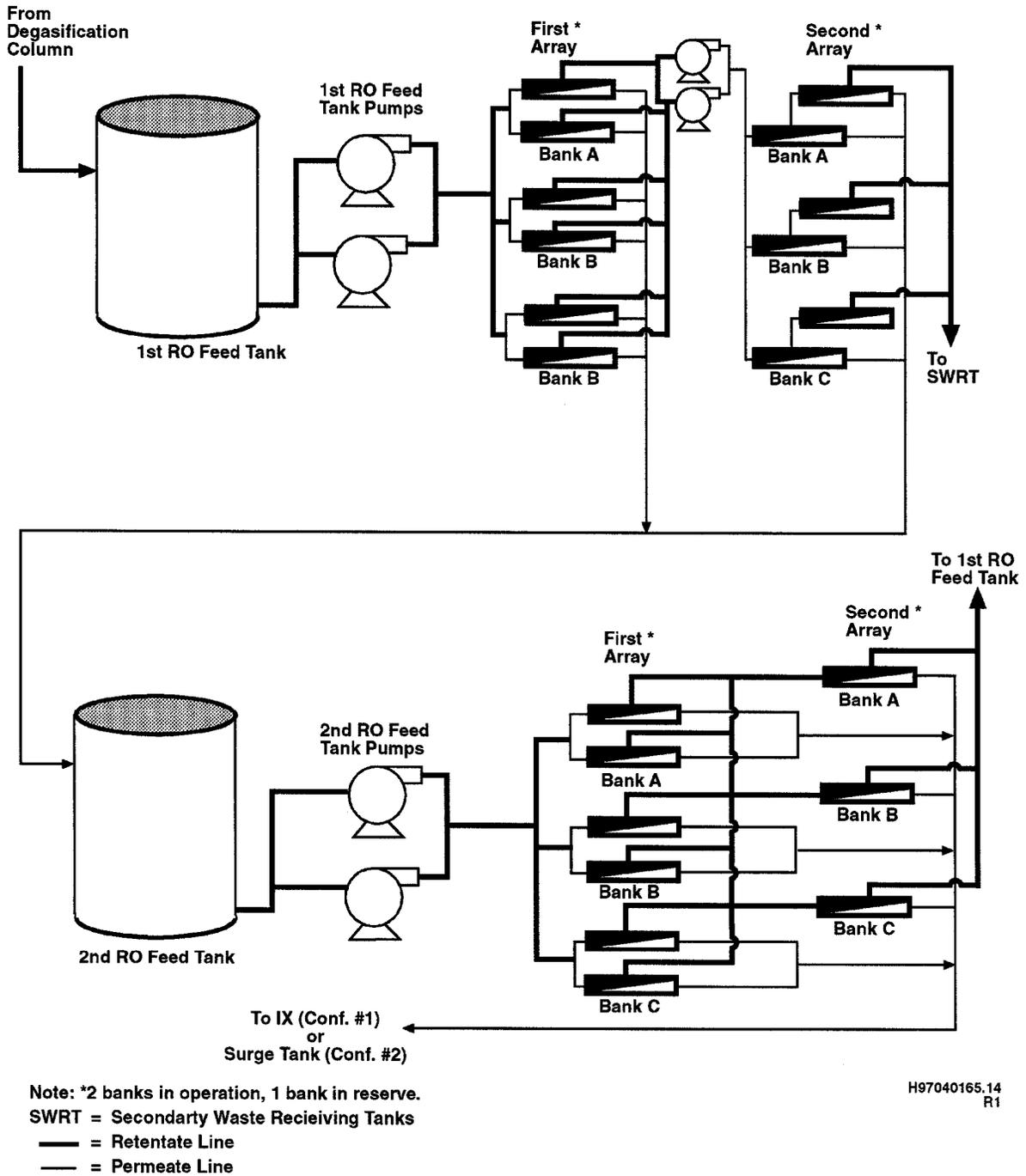
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Figure C.9. Reverse Osmosis Unit

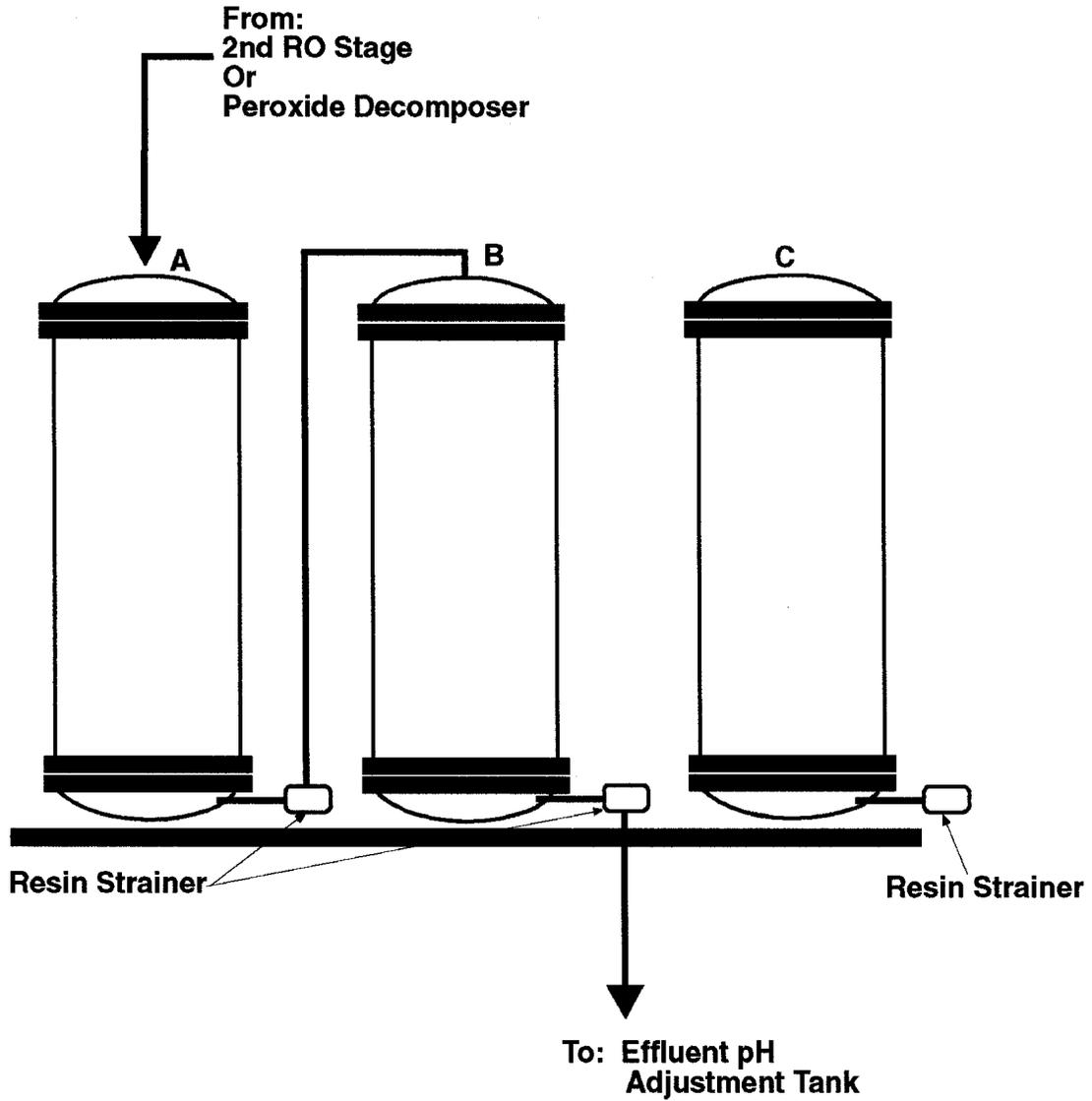


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Figure C.10. Ion Exchange Unit



**NOTE: Example Configuration- Column A and B in Operation,
Column C in Standby Mode**

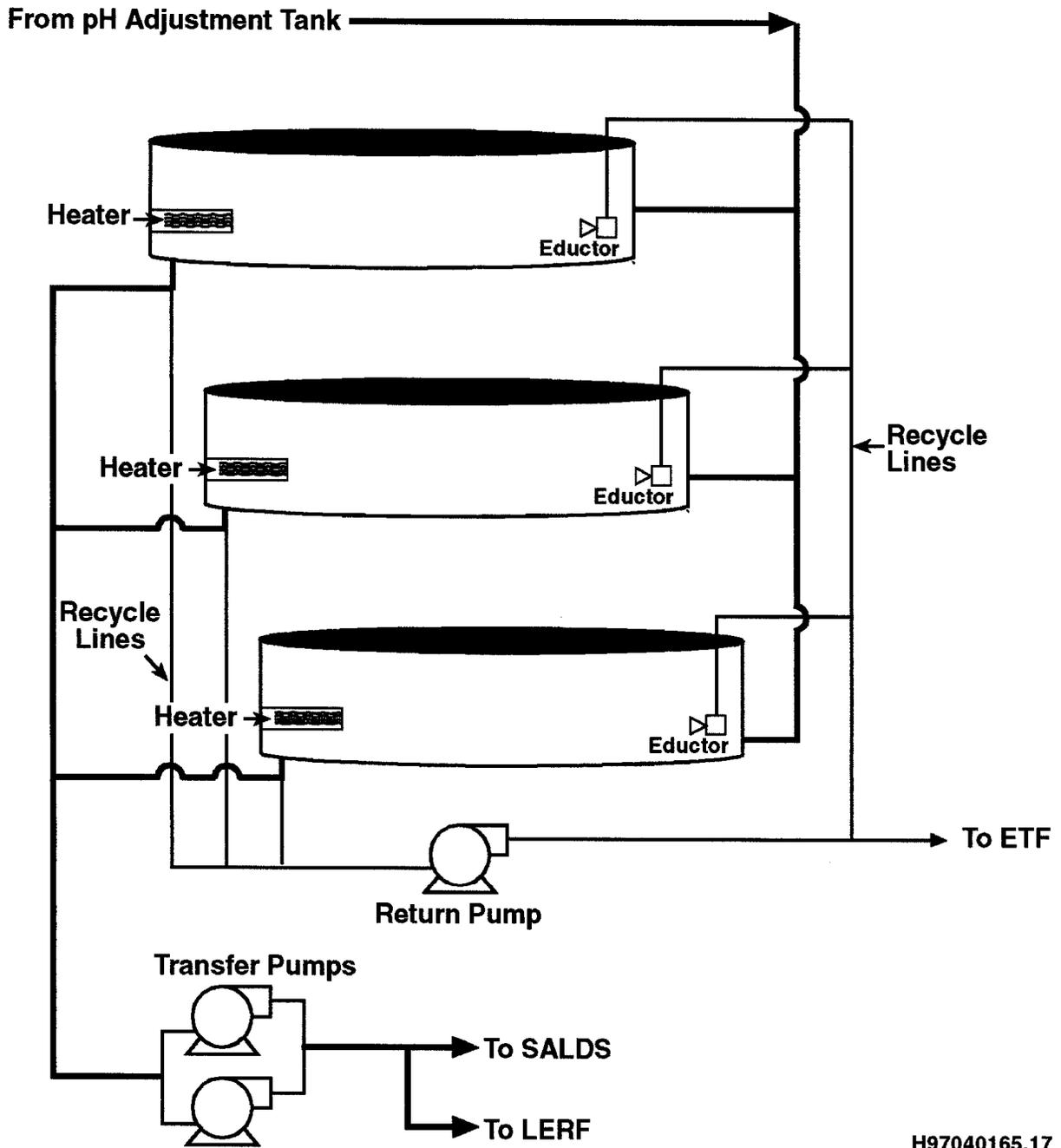
H97040165.18

2

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2

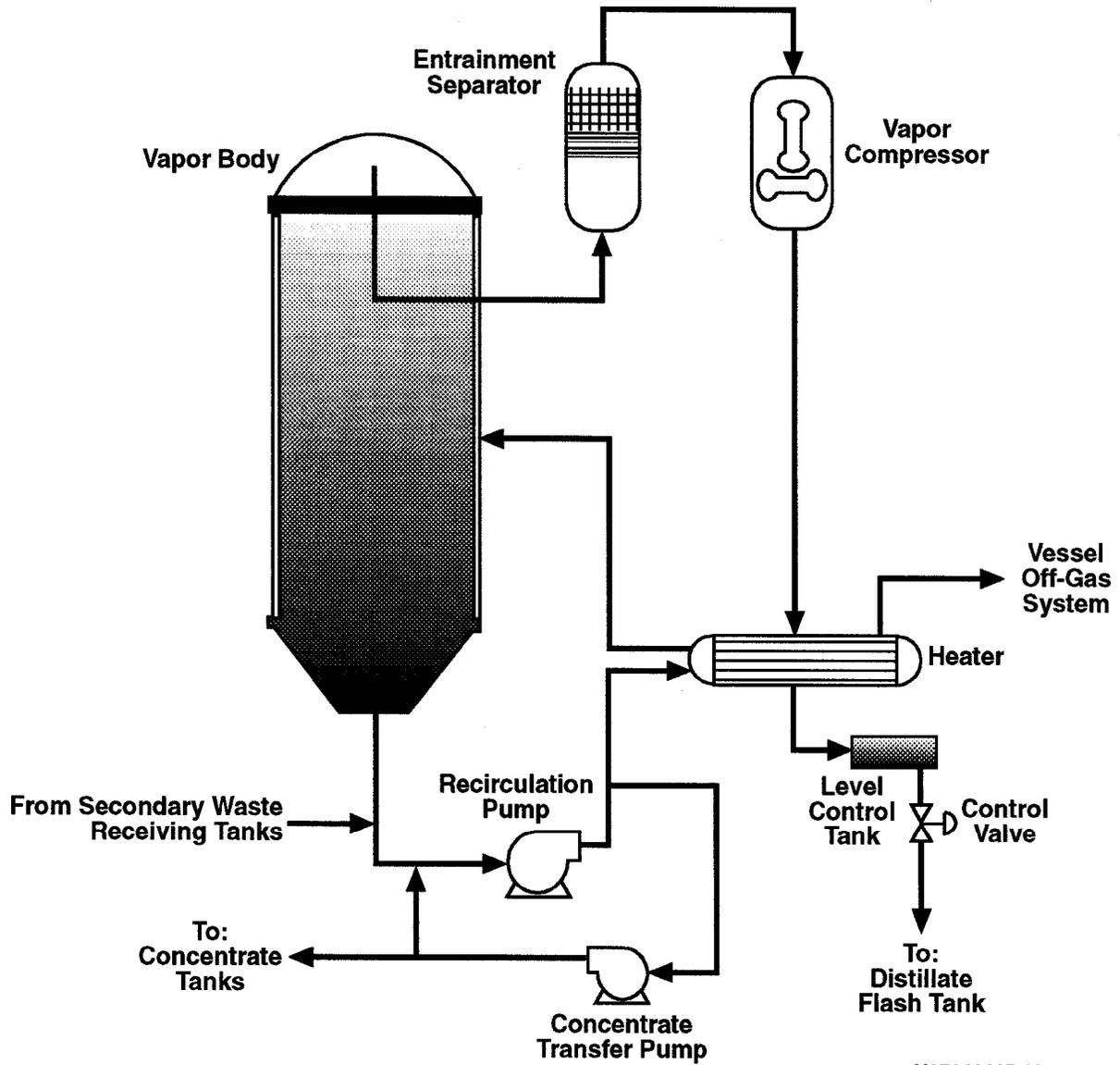
Figure C.11. Verification Tanks



H97040165.17
R1

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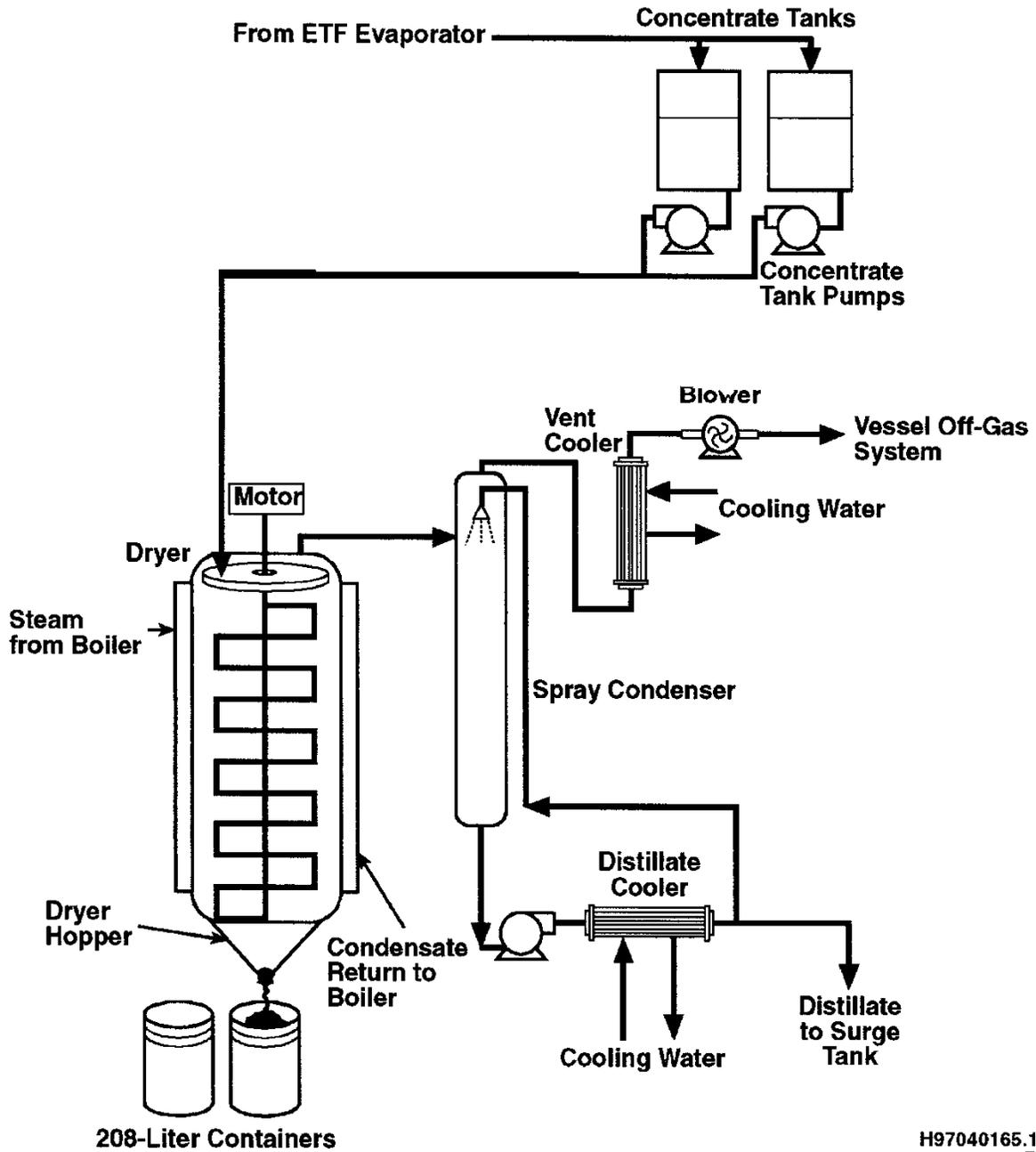
Figure C.12. Effluent Treatment Facility Evaporator



H97040165.10
R2

1
2

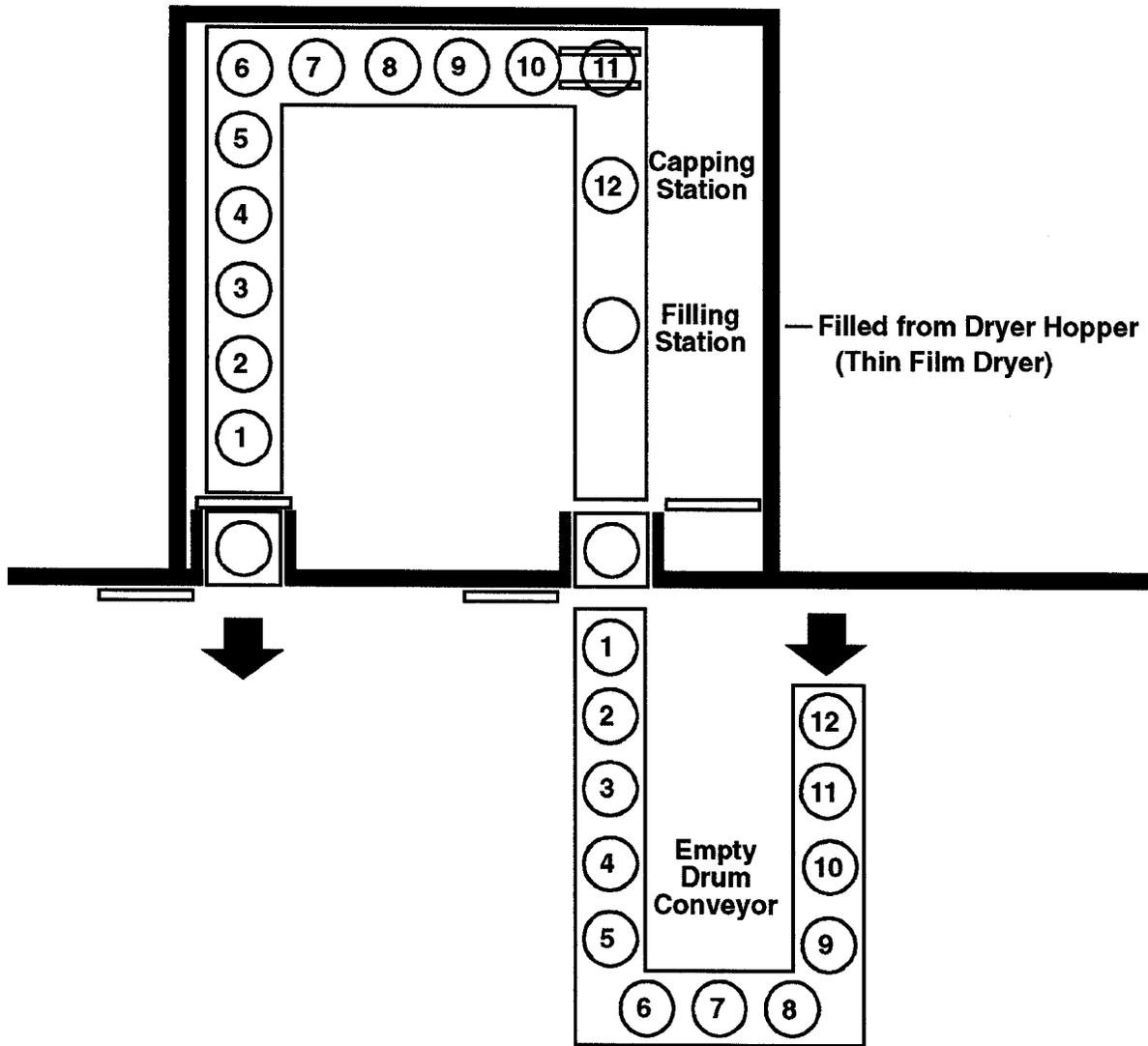
Figure C.13. Thin Film Dryer



H97040165.16
R1

1
2

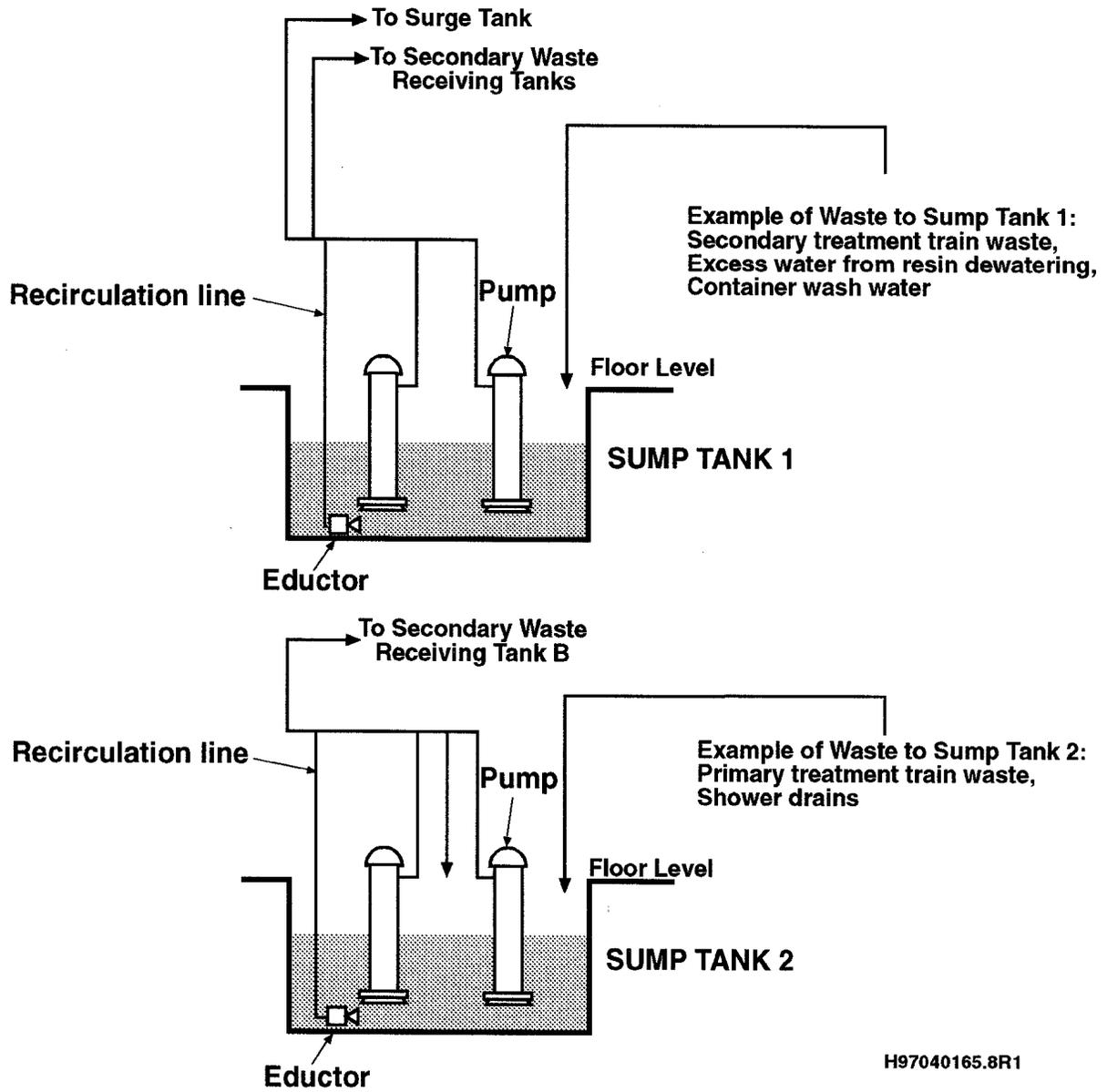
Figure C.14. Container Handling System



H97040165.15
R1

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2

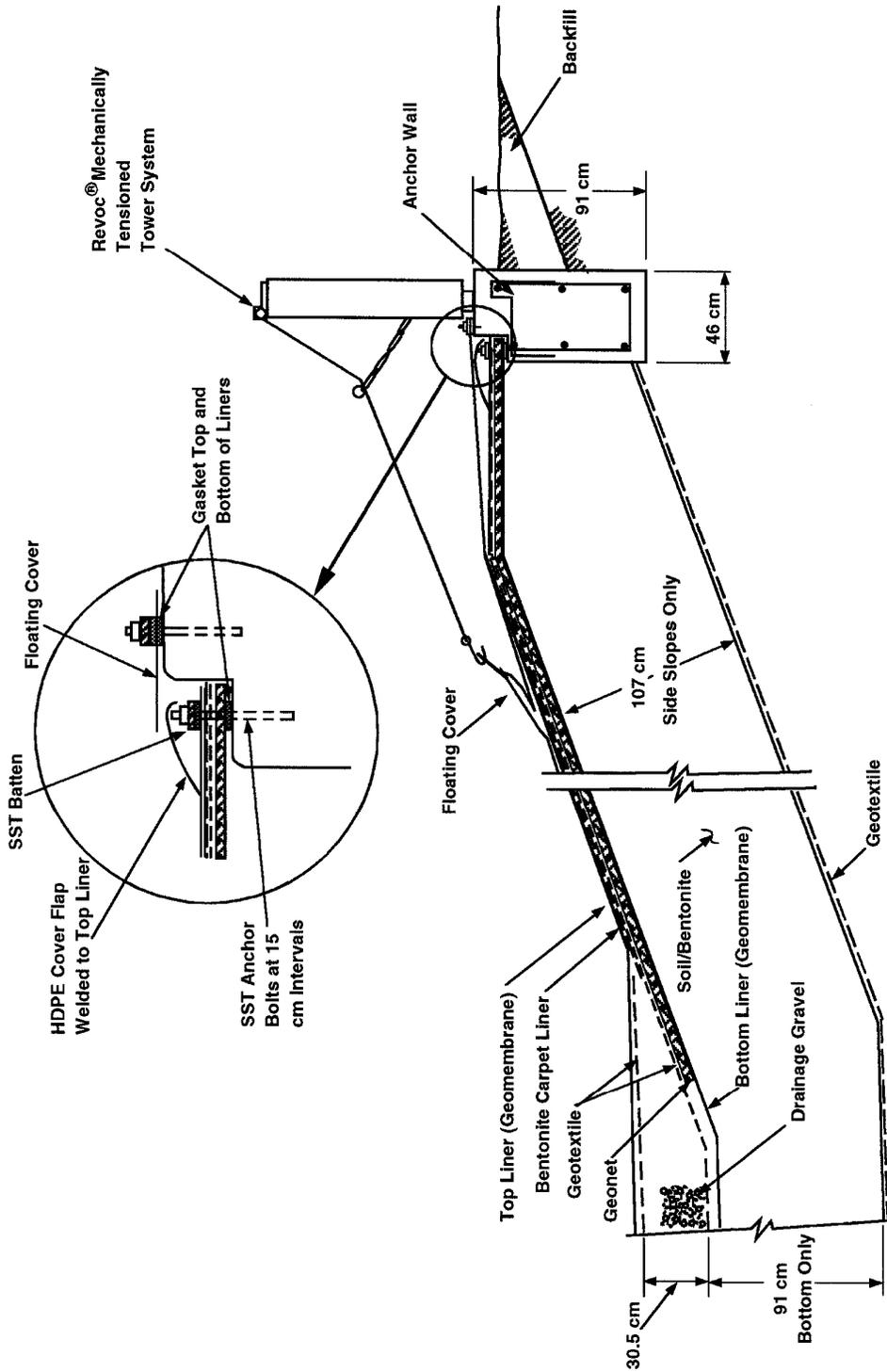
Figure C.15. Effluent Treatment Facility Sump Tanks



H97040165.8R1

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Figure C.16. Liner Anchor Wall and Cover Tension System

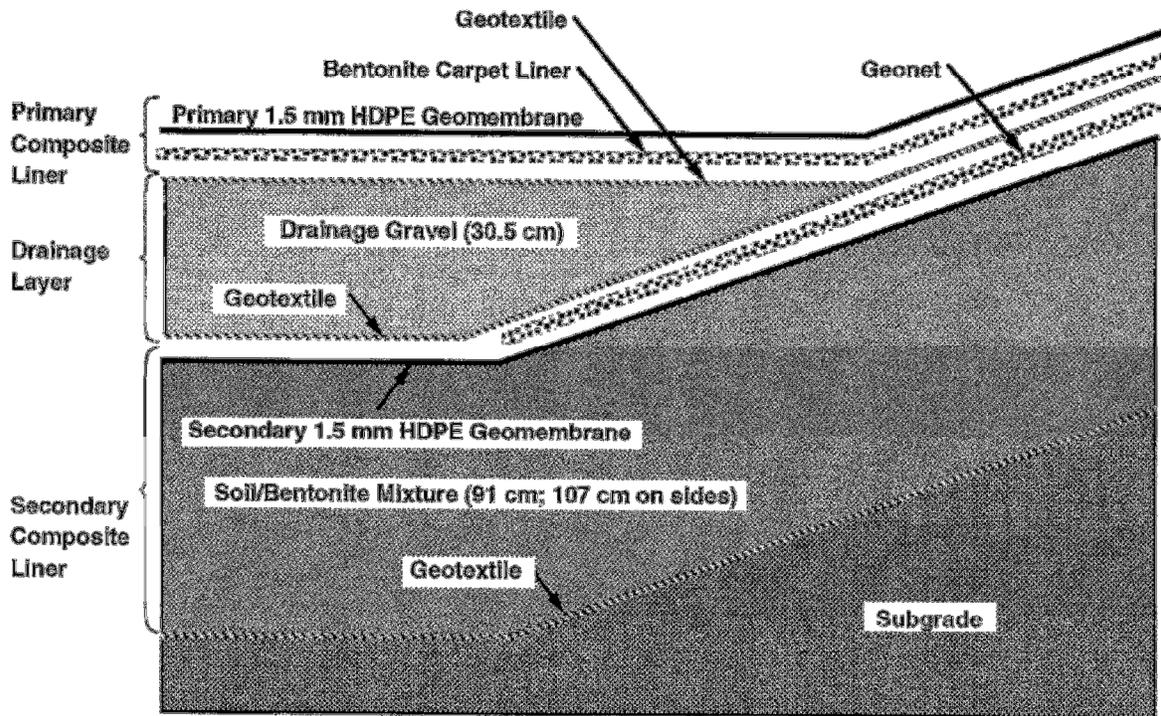


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Not to Scale

1
2

Figure C.17. Liner System Schematic

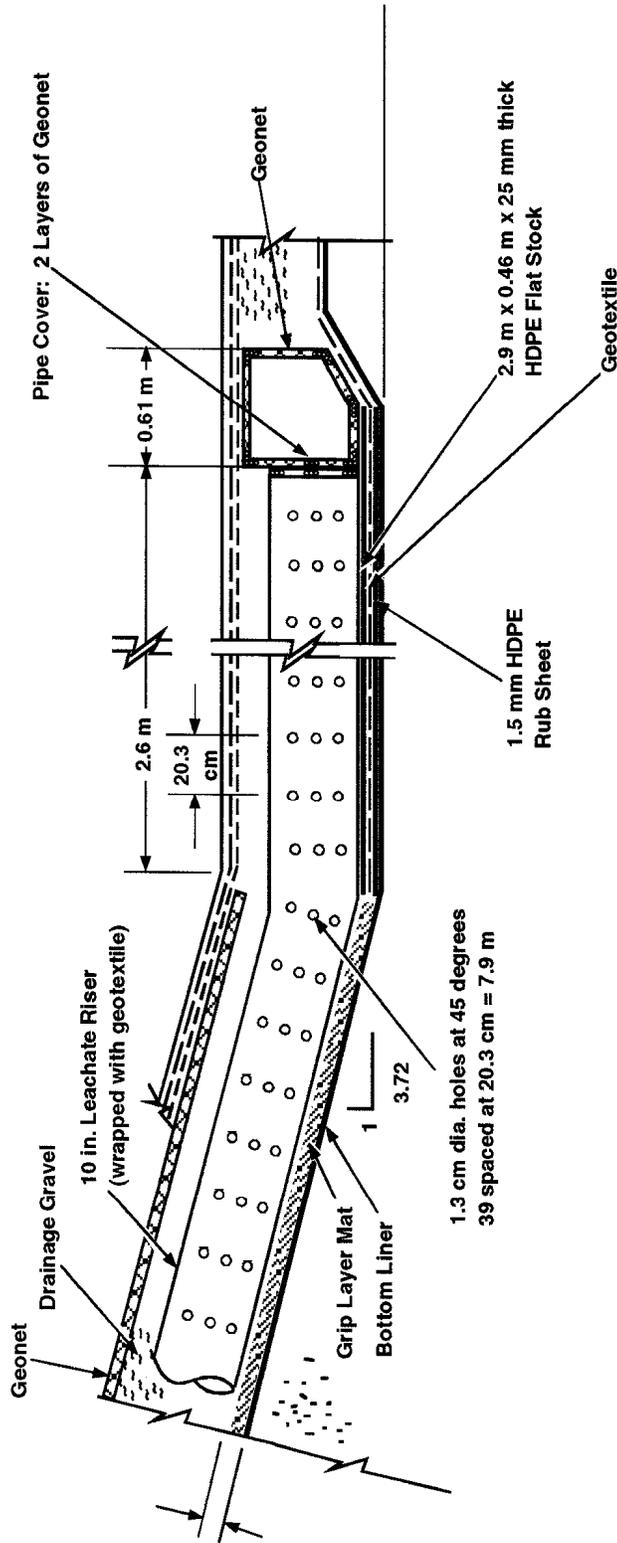


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H97040165.1

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3

Figure C.18. Detail of Leachate Collection Sump



Section View

HDPE: High Density Polyethylene
Not to Scale

H97040165.3

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C. PROCESS INFORMATION

This addendum provides a detailed discussion of the LERF and 200 Area ETF processes and equipment. The LERF and 200 Area ETF comprise an aqueous waste treatment system located in the 200 East Area that provides storage and treatment for a variety of aqueous mixed waste. This aqueous waste includes process condensate from the 242-A Evaporator 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 the Final Delisting ([40 CFR 261](#), Appendix IX, Table 2).

C.1 LIQUID EFFLUENT RETENTION FACILITY PROCESS DESCRIPTION

Each of the three LERF basins has an operating capacity of 29.5-million liters. The LERF receives aqueous waste through several inlets including the following:

- A pipeline that connects LERF with the 242-A Evaporator
- A pipeline from the 200 West Area
- A pipeline that connects LERF to the Load-In Station at the 200 Area ETF
- A series of sample ports located at each basin.

Figure C.1 presents a general layout of LERF and associated pipelines. Aqueous waste from LERF is pumped to the 200 Area ETF through one of two double-walled fiberglass transfer pipelines. Effluent from the 200 Area ETF also can be transferred back to the LERF through one of these transfer pipelines. These pipelines are equipped with leak detection located in the annulus between the inner and outer pipes. In the event that these leak detectors are not in service, the pipelines are visually inspected during transfers for leakage by opening the secondary containment drain lines located at the 200 Area ETF end of the transfer pipelines.

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 aqueous waste receipt piping (except for aqueous waste received from the 242-A Evaporator), 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 and allows samples to be collected from any depth. Personnel access to these sample ports is from the perimeter area of the basins.

A catch basin is provided at the northwest corner of each LERF basin for aboveground piping and manifolds for transfer pumps. Aqueous waste from the 242-A Evaporator is transferred through piping which ties into piping at the catch basins. Under routine operations, a submersible pump is used to transfer aqueous waste from a LERF basin to the 200 Area ETF for processing or for basin-to-basin transfers. This pump is connected to a fixed manifold on one of four available risers.

Each basin consists of a multilayer liner system supported by a concrete anchor wall around the basin perimeter and a soil-bentonite clay underlayment. The multilayer liner system consists of a primary liner in contact with the aqueous waste, a layer of bentonite carpet, a geonet, a geotextile, a gravel layer, and a secondary liner that rests on the bentonite underlayment. Any aqueous waste leakage through the primary liner flows through the geonet and gravel to a leachate collection system. The leachate flows to a sump at the northwest corner of each basin, where the leachate is pumped up the side slope and back into the basin above the primary liner. Each liner is constructed of high-density polyethylene. A floating cover made of very low-density polyethylene is stretched over each basin above the primary liner. These covers serve to keep unwanted material from entering the basins, and to minimize evaporation of the liquid contents.

C.2 EFFLUENT TREATMENT FACILITY PROCESS DESCRIPTION

The 200 Area ETF is designed as a flexible treatment system that provides treatment for contaminants anticipated in process condensate and other onsite aqueous waste. The design influent flow rate into the 200 Area ETF is approximately 570 liters per minute, with planned outages for activities such as maintenance on the 200 Area ETF systems. Maintenance outages typically are scheduled between treating a batch of aqueous waste, referred to as treatment campaigns. The effluent flow (or volume) is equivalent to the influent flow (or volume).

The 200 Area ETF generally receives aqueous waste directly from the LERF. However, aqueous waste also can be transferred from tanker trucks at the Load-In Station to the 200 Area ETF and from containers (e.g., carboys, drums) directly to ETF. Aqueous waste is treated and stored in the 200 Area ETF process areas in a series of tank systems, referred to as process units. Within the ETF, waste also is managed in containers through treatment and/or storage. Figure C.2 provides the relative locations of the process and container storage areas within the ETF.

The process units are grouped in either the primary or the secondary treatment train. The primary treatment train provides for the removal or destruction of contaminants. Typically, the secondary treatment train processes the waste by-products from the primary treatment train by reducing the volume of waste. In the secondary treatment train, contaminants are concentrated and dried to a powder. The liquid fraction is routed to the primary treatment train. Figure C.3 provides an overview of the layout of the ETF, 2025E Building). Figure C.4 presents the 200 Area ETF floor plan, the relative locations of the individual process units and associated tanks within the ETF, and the location of the Load-In Station.

The dry powder waste and maintenance and operations waste are containerized and stored or treated in the container storage areas or in collection or treatment areas within the Process Area. Secondary containment is provided for all containers and tank systems (including ancillary equipment) housed within the ETF. The trenches and floor of the 200 Area ETF comprise the secondary containment system. The floor includes approximately a 15.2-centimeter rise (berm) along the containing walls of the process and container storage areas. Any spilled or leaked material from within the process area or container storage area is collected into trenches that feed into either sump tank 1 or sump tank 2. From these sump tanks, the spilled or leaked material (i.e., waste) is fed to either the surge tank and processed in the primary treatment train or the secondary waste receiving tanks and processed in the secondary treatment train. All tank systems outside of the 200 Area ETF are provided with a secondary containment system.

In the following sections, several figures are provided that present general illustrations of the treatment units and the relation to the process.

C.2.1 Load-In Station

The 200 Area ETF receives aqueous waste from LERF or the Load-In Station. The 200 Area ETF Load-In Station, located due east of the surge tank and outside of the perimeter fence (Figure C.4), was designed and constructed to provide the capability to unload, store, and transfer aqueous waste to the LERF or 200 Area ETF from tanker trucks and other containers (such as drums). The Load-In Station consists of two truck bays equipped with load-in tanks, transfer pumps, filtration system, level instrumentation for tanker trucks, leak detection capabilities for the containment basin and transfer line, and an underground transfer line that connects to lines in the surge tank berm, allowing transfers to either the 200 Area ETF surge tank or LERF. The Load-In Station is covered with a steel building for weather protection. Tanker trucks and other containers are used to unload aqueous waste at the Load-In Station. To perform unloading, the tanker truck is positioned on a truck pad, a 'load-in' transfer line is connected to the truck, and the tanker contents are pumped into one of the Load-In Station tanks, the surge tank, or directly to the LERF. For container unloading, the container is placed on the truck pad and the container contents are pumped into one of the Load-In Station tanks, the surge tank, or directly to the LERF.

1 During unloading operations, solids may be removed from the waste by pumping the contents of the
2 tanker truck or container through a filtration system. If solids removal is not needed, the filtration system
3 is not used and the solution is transferred directly to the Load-In Station tanks, surge tank, or to LERF.

4 Any leaks at the Load-In Station drain to the sump. A leak detector in the sump alarms locally and in the
5 200 Area ETF control room. Alternatively, leaks can be visually detected.

6 **C.2.2 Effluent Treatment Facility Operating Configuration**

7 Because the operating configuration of the 200 Area ETF can be adjusted or modified, most aqueous
8 waste streams can be effectively treated to below Delisting and Discharge Permit limits. The operating
9 configuration of the 200 Area ETF depends on the unique chemistry of an aqueous waste stream(s).
10 Before an aqueous waste stream is accepted for treatment, the waste is characterized and evaluated.
11 Information from the characterization is used to adjust the treatment process or change the configuration
12 of the 200 Area ETF process units, as necessary, to optimize the treatment process for a particular
13 aqueous waste stream.

14 Typically, an aqueous waste is processed first in the primary treatment train, where the 200 Area ETF is
15 configured to process an aqueous waste through the UV/OX unit first, followed by the RO unit.
16 However, under an alternate configuration, an aqueous waste could be processed in the RO unit first. For
17 example, high concentrations of nitrates in an aqueous waste might interfere with the performance of the
18 UV/OX. In this case, the 200 Area ETF could be configured to process the waste in the RO unit before
19 the UV/OX unit.

20 The flexibility of the 200 Area ETF also allows some aqueous waste to be processed in the secondary
21 treatment train first. For example, for small volume aqueous waste with high concentrations of some
22 anions and metals, the approach could be to first process the waste stream in the secondary treatment
23 train. This approach would prevent premature fouling or scaling of the RO unit. The liquid portion (i.e.,
24 untreated overheads from the 200 Area ETF evaporator and thin film dryer) would be sent to the primary
25 treatment train.

26 Figure C.5 and Figure C.6 provide example process flow diagrams for two different operating
27 configurations.

28 **C.2.3 Primary Treatment Train**

29 The primary treatment train consists of the following processes:

- 30 • Influent Receipt/Surge tank - inlet, surge capacity
- 31 • Filtration - for suspended solids removal
- 32 • UV/OX - organic destruction
- 33 • pH adjustment - waste neutralization
- 34 • Hydrogen peroxide decomposition - removal of excess hydrogen peroxide
- 35 • Degasification - removal of carbon dioxide
- 36 • RO - removal of dissolved solids
- 37 • IX - removal of dissolved solids
- 38 • Verification - holding tanks during verification

39 **Influent Receipt/Surge Tank.** Depending on the configuration of the ETF, the surge tank is one inlet
40 used to feed an aqueous waste into the 200 Area ETF for treatment. In Configuration 1 (Figure C.5), the
41 surge tank is the first component downstream of the LERF. The surge tank provides a storage/surge
42 volume for chemical pretreatment and controls feed flow rates from the LERF to the 200 Area ETF.
43 However, in Configuration 2 (Figure C.6), aqueous waste from LERF is fed directly into the treatment
44 units. In this configuration, the surge tank receives aqueous waste, which has been processed in the RO
45 units, and provides the feed stream to the remaining downstream process units. In yet another
46 configuration, some small volume aqueous waste could be received into the secondary treatment train
47 first for processing. In this case, the aqueous waste would be received directly into the secondary waste

1 receiving tanks. Finally, the surge tank also receives waste extracted from various systems within the
2 primary and secondary treatment train while in operation.

3 The surge tank is located outside the 200 Area ETF on the south side. In the surge tank (Figure C.7), the
4 pH of an aqueous waste is adjusted using the metered addition of sulfuric acid and sodium hydroxide, as
5 necessary, to prepare the waste for treatment in downstream processes. In addition, hydrogen peroxide or
6 biocides could be added to control biological growth in the surge tank. A pump recirculates the contents
7 in the surge tank, mixing the chemical reagents with the waste to a uniform pH.

8 **Filtration.** Two primary filter systems remove suspended particles in an aqueous waste: a rough filter
9 removes the larger particulates, while a fine filter removes the smaller particulates. The location of these
10 filters depends on the configuration of the primary treatment train. However, the filters normally are
11 located upstream of the RO units.

12 The solids accumulating on these filter elements are backwashed to the secondary waste receiving tanks
13 with pulses of compressed air and water, forcing water back through the filter. The backwash operation is
14 initiated either automatically by a rise in differential pressure across the filter or manually by an operator.
15 The filters are cleaned chemically when the backwashing process does not facilitate acceptable filter
16 performance.

17 Auxiliary fine and rough filters (e.g., disposable filters) have been installed to provide additional filtration
18 capabilities. Depending on the configuration of the ETF, the auxiliary filters are operated either in series
19 with the primary filters to provide additional filtration or in parallel, instead of the primary fine and rough
20 filters, to allow cleaning/maintenance of the primary fine and rough filters while the primary treatment
21 train is in operation.

22 **Ultraviolet Light/Oxidation.** Organic compounds contained in an aqueous waste stream are destroyed
23 in the UV/OX system (Figure C.8). Hydrogen peroxide is mixed with the waste. The UV/OX system
24 uses the photochemical reaction of UV light on hydrogen peroxide to form hydroxyl radicals and other
25 reactive species that oxidize the organic compounds. The final products of the complete reaction are
26 carbon dioxide, water, and inorganic ions.

27 Organic destruction is accomplished in two UV/OX units operating in parallel. During the UV/OX
28 process, the aqueous waste passes through reaction chambers where hydrogen peroxide is added. While
29 in the UV/OX system, the temperature of an aqueous waste is monitored. Heat exchangers are used to
30 reduce the temperature of the waste should the temperature of the waste approach the upper limits for the
31 UV/OX or RO systems.

32 **pH Adjustment.** The pH of a waste stream is monitored and controlled at different points throughout the
33 treatment process. Within the primary treatment train, the pH of a waste can be adjusted with sulfuric
34 acid or sodium hydroxide to optimize operation of downstream treatment processes or adjusted before
35 final discharge. For example, the pH of an aqueous waste would be adjusted in the pH adjustment tank
36 after the UV/OX process and before the RO process. In this example, pH is adjusted to cause certain
37 chemical species such as ammonia to form ammonium sulfate, thereby increasing the rejection rate of the
38 RO.

39 **Hydrogen Peroxide Decomposition.** Typically, hydrogen peroxide added into the UV/OX system is not
40 consumed completely by the system. Because hydrogen peroxide is a strong oxidizer, the residual
41 hydrogen peroxide from the UV/OX system is removed to protect the downstream equipment. The
42 hydrogen peroxide decomposer uses a catalyst to break down the hydrogen peroxide that is not consumed
43 completely in the process of organic destruction. The aqueous waste is sent through a column that breaks
44 down the hydrogen peroxide into water and oxygen. The gas generated by the decomposition of the
45 hydrogen peroxide is vented to the vessel off gas system.

46 **Degasification.** The degasification column is used to purge dissolved carbon dioxide from the aqueous
47 waste to reduce the carbonate loading to downstream dissolved solids removal processes within the
48 200 Area ETF primary treatment train. The purged carbon dioxide is vented to the vessel off gas system.

1 **Reverse Osmosis.** The RO system (Figure C.9) uses pressure to force clean water molecules through
2 semi-permeable membranes while keeping the larger molecule contaminants, such as dissolved solids,
3 and large molecular weight organic materials, in the membrane. The RO process uses a staged
4 configuration to maximize water recovery. The process produces two separate streams, including a clean
5 'permeate' and a concentrate (or retentate), which are concentrated as much as possible to minimize the
6 amount of secondary waste produced.

7 The RO process is divided into first and second stages. Aqueous waste is fed to the first RO stage from
8 the RO feed tank. The secondary waste receiving tanks of the secondary treatment train receive the
9 retentate removed from the first RO stage, while the second RO stage receives the permeate (i.e., 'treated'
10 aqueous waste from the first RO stage). In the second RO stage, the retentate is sent to the first stage RO
11 feed tank while the permeate is sent to the IX system or to the surge tank, depending on the configuration
12 of the ETF.

13 Two support systems facilitate this process. An anti-scale system injects scale inhibitors as needed into
14 the feed waste to prevent scale from forming on the membrane surface. A clean-in-place system using
15 cleaning agents, such as descalants and surfactants, cleans the membrane pores of surface and subsurface
16 deposits that have fouled the membranes.

17 **Ion Exchange.** Because the RO process removes most of the dissolved solids in an aqueous waste, the
18 IX process (Figure C.10) acts as a polishing unit. The IX system consists of three columns containing
19 beds of cation and/or anion resins. This system is designed to allow for regeneration of resins and
20 maintenance of one column while the other two are in operation. Though the two columns generally are
21 operated in series, the two columns also can be operated in parallel or individually.

22 Typically, the two columns in operation are arranged in a primary/secondary (lead/lag) configuration, and
23 the third (regenerated) column is maintained in standby. When dissolved solids breakthrough the first
24 IX column and are detected by a conductivity sensor, this column is removed from service for
25 regeneration, and the second column replaces the first column and the third column is placed into service.
26 The column normally is regenerated using sulfuric acid and sodium hydroxide. The resulting
27 regeneration waste is collected in the secondary waste receiving tanks.

28 Spent resins are transferred into a disposal container should regeneration of the IX resins become
29 inefficient. Free water is removed from the container and returned to the surge tank. Dewatered resins are
30 transferred to a final storage/disposal point.

31 **Verification.** The three verification tanks (Figure C.11) are used to hold the treated effluent while a
32 determination is made that the effluent meets discharge limits. The effluent can be returned to the
33 primary treatment train for additional treatment, or to the LERF, should a treated effluent not meet
34 Discharge Permit or Final Delisting requirements.

35 The three verification tanks alternate between three operating modes: receiving treated effluent, holding
36 treated effluent during laboratory analysis and verification, or discharging verified effluent. Treated
37 effluent may also be returned to the 200 Area ETF to provide 'clean' service water for operational and
38 maintenance functions, e.g., for boiler water and for backwashing the filters. This recycling keeps the
39 quantity of fresh water used to a minimum.

40 **C.2.4 Secondary Treatment Train**

41 The secondary treatment system typically receives and processes the following by-products generated
42 from the primary treatment train: concentrate from the first RO stage, filter backwash, regeneration waste
43 from the ion exchange system, and spillage or overflow received into the process sumps. Depending on
44 the operating configuration, however, some aqueous waste could be processed in the secondary treatment
45 train before the primary treatment train (refer to Figure C.5 and Figure C.6 for example operating
46 configurations).

47 The secondary treatment train provides the following processes:

- 1 • Secondary waste receiving - tank receiving and chemical addition
- 2 • Evaporation - concentrates secondary waste streams
- 3 • Concentrate staging - concentrate receipt, pH adjustment, and chemical addition
- 4 • Thin film drying - dewatering of secondary waste streams
- 5 • Container handling - packaging of dewatered secondary waste

6 **Secondary Waste Receiving.** Waste to be processed in the secondary treatment train is received into two
7 secondary waste receiving tanks, where the pH can be adjusted with sulfuric acid or sodium hydroxide for
8 optimum evaporator performance. Chemicals, such as reducing agents, may be added to waste in the
9 secondary waste receiving tanks to reduce the toxicity or mobility of constituents in the powder.

10 **Evaporation.** The 200 Area ETF evaporator is fed alternately by the two secondary waste receiving
11 tanks. One tank serves as a waste receiver while the other tank is operated as the feed tank. The
12 200 Area ETF evaporator vessel (also referred to as the vapor body) is the principal component of the
13 evaporation process (Figure C.12).

14 Feed from the secondary waste receiving tanks is pumped through a heater to the recirculation loop of the
15 200 Area ETF evaporator. In this loop, concentrated waste is recirculated from the 200 Area ETF
16 evaporator, to a heater, and back into the evaporator where vaporization occurs. As water leaves the
17 evaporator system in the vapor phase, the concentration of the waste in the evaporator increases. When
18 the concentration of the waste reaches the appropriate density, a portion of the concentrate is pumped to
19 one of the concentrate tanks.

20 The vapor that is released from the 200 Area ETF evaporator is routed to the entrainment separator, where
21 water droplets and/or particulates are separated from the vapor. The 'cleaned' vapor is routed to the vapor
22 compressor and converted to steam. The steam from the vapor compressor is sent to the heater (reboiler)
23 and used to heat the recirculating concentrate in the 200 Area ETF evaporator. From the heater, the steam
24 is condensed and fed to the distillate flash tank, where the saturated condensate received from the heater
25 drops to atmospheric pressure and cools to the normal boiling point through partial flashing (rapid
26 vaporization caused by a pressure reduction). The resulting distillate is routed to the surge tank. The
27 non-condensable vapors, such as air, are vented through a vent gas cooler to the vessel off gas system.

28 **Concentrate Staging.** The concentrate tanks make up the head end of the thin film drying process. From
29 the 200 Area ETF evaporator, concentrate is pumped into two concentrate tanks, and pH adjusted
30 chemicals, such as reducing agents, may be added to reduce the toxicity or mobility of constituents when
31 converted to powder. Waste is transferred from the concentrate tanks to the thin film dryer for conversion
32 to a powder. The concentrate tanks function alternately between concentrate receiver and feed tank for
33 the thin film dryer. However, one tank may serve as both concentrate receiver and feed tank.

34 Because low solubility solids (i.e., calcium and magnesium sulfate) tend to settle in the concentrate tanks,
35 these solids must be removed to prevent fouling and to protect the thin film dryer, and to maintain
36 concentrate tank capacity.

37 **Thin Film Drying.** From the concentrate tanks, feed is pumped to the thin film dryer (Figure C.13) that
38 is heated by steam. As the concentrated waste flows down the length of the dryer, the waste is dried. The
39 dried film, or powder, is scraped off the dryer cylinder by blades attached to a rotating shaft. The powder
40 is funneled through a cone-shaped powder hopper at the bottom of the dryer and into the Container
41 Handling System.

42 Overhead vapor released by the drying of the concentrate is condensed in the distillate condenser. Excess
43 heat is removed from the distillate by a water-cooled heat exchanger. Part of the distillate is circulated
44 back to the condenser spray nozzles. The remaining distillate is pumped to the surge tank. Any
45 noncondensable vapors and particulates from the spray condenser are exhausted to the vessel off gas
46 system.

47 **Container Handling.** Before an empty container is moved into the Container Handling System
48 (Figure C.14), the lid is removed and the container is placed on a conveyor. The containers are moved

1 into the container filling area after passing through an air lock. The empty container is located under the
2 thin film dryer, and raised into position. The container is sealed to the thin film dryer and a rotary valve
3 begins the transfer of powder to the empty container. Air displaced from the container is vented to the
4 distillate condenser attached to the 200 Area ETF evaporator that exhausts to the vessel off gas system.

5 The container is filled to a predetermined level, then lowered from the thin film dryer and moved along a
6 conveyor. The filled container is manually recapped, and moved along the conveyor to the airlock. At
7 the airlock, the container is moved onto the conveyor by remote control. The airlock is opened, the smear
8 sample (surface wipe) is taken, and the contamination level counted. A 'C' ring is installed to secure the
9 container lid. If the container has contaminated material on the outside, the container is wiped down and
10 retested. Filled containers that pass the smear test are labeled, placed on pallets, and moved by forklift to
11 the filled container storage area. Section C.3 provides a more detailed discussion of container handling.

12 **C.2.5 Other Effluent Treatment Facility Systems**

13 The 200 Area ETF is provided with support systems that facilitate treatment in the primary and secondary
14 treatment trains and that provide for worker safety and environmental protection. An overview of the
15 following systems is provided:

- 16 • Monitor and control system
- 17 • Vessel off gas system
- 18 • Sump collection system
- 19 • Chemical injection feed system
- 20 • Verification tank recycle system
- 21 • Utilities

22 **C.2.5.1 Monitor and Control System**

23 The operation of the 200 Area ETF is monitored and controlled by a centralized computer system (i.e.,
24 monitor and control system or MCS). The MCS continuously monitors data from various field indicators,
25 such as pH, flow, tank level, temperature, pressure, conductivity, alarm status, and valve switch positions.
26 Data gathered by the MCS enable operations and engineering personnel to document and adjust the
27 operation of the ETF.

28 **C.2.5.2 Vessel Off gas System**

29 Ventilation for various tanks and vessels is provided through the vessel off gas system. The system
30 includes a moisture separator, duct heater, pre-filter, high-efficiency particulate air filters, carbon absorber
31 (when required to reduce organic emissions), exhaust fans, and ductwork. Gasses ventilated from the
32 tanks and vessels enter the exhaust system through the connected ductwork. The vessel off gas system
33 draws vapors and gasses off the following tanks and treatment systems:

- 34 • Surge tank
- 35 • Vent gas cooler (off the ETF evaporator/distillate flash tank)
- 36 • pH adjustment tank
- 37 • Concentrate tanks
- 38 • Degasification system
- 39 • First and second RO stages
- 40 • Dry powder hopper
- 41 • Effluent pH adjustment tank
- 42 • Drum capping station
- 43 • Secondary waste receiving tanks
- 44 • Distillate condenser (off the thin film dryer)
- 45 • Sump tanks 1 and 2

46 The vessel off gas system maintains a negative pressure with respect to the atmosphere, which produces a
47 slight vacuum within tanks, vessels, and ancillary equipment for the containment of gas vapor. This
48 system also provides for the collection, monitoring, and treatment of confined airborne in-vessel

1 contaminants to preclude over-pressurization. The high-efficiency particulate air filters remove
2 particulates and condensate from the air stream before these are discharged to the heating, ventilation, and
3 air conditioning system.

4 **C.2.5.3 Sump Collection System**

5 Sump tanks 1 and 2 compose the sump collection system that provides containment of waste streams and
6 liquid overflow associated with the 200 Area ETF processes. The process area floor is sloped to two
7 separate trenches that each drain to a sump tank located under the floor of the 200 Area ETF
8 (Figure C.15). One trench runs the length of the primary treatment train and drains to Sump Tank 2,
9 located underneath the verification tank pump floor. The second trench collects spillage primarily from
10 the secondary treatment train and flows to Sump Tank 1, located near the 200 Area ETF evaporator.
11 Sump tanks 1 and 2 are located below floor level (Figure C.15). An eductor in these tanks prevents
12 sludge from accumulating.

13 **C.2.5.4 Chemical Injection Feed System**

14 At several points within the primary and secondary treatment trains, sulfuric acid and sodium hydroxide
15 (or dilute solutions of these reagents) are metered into specific process units to adjust the pH. For
16 example, a dilute solution of 4 percent sulfuric acid and 4 percent sodium hydroxide could be added to
17 the secondary waste receiving tanks to optimize the evaporation process.

18 **C.2.5.5 Verification Tank Recycle System**

19 To reduce the amount of water added to the process, verification tank water (i.e., verified effluent) is
20 recycled throughout the 200 Area ETF process. Tanks and ancillary equipment that use verification tank
21 water include:

- 22 • 4 percent H₂SO₄ solution tank and ancillary equipment
- 23 • 4 percent NaOH solution tank and ancillary equipment
- 24 • Clean-in-place tank and ancillary equipment
- 25 • IX columns (during resin regeneration)
- 26 • 200 Area ETF evaporator boiler and ancillary equipment
- 27 • Thin film dryer boiler and ancillary equipment
- 28 • Seal water system. In addition, verification tank water is used extensively during maintenance
29 activities. For example, it may be used to flush piping systems or to confirm the integrity of piping, a
30 process tank or tank truck.

31 **C.2.5.6 Utilities**

32 The 200 Area ETF maintains the following utility supply systems required for the operation of the ETF:

- 33 • Cooling water system - removes heat from process water via heat exchangers and a cooling tower
- 34 • Compressed air system - provides air to process equipment and instrumentation
- 35 • Seal water system - provides cool, clean, pressurized water to process equipment for pump seal
36 cooling and pump seal lubrication, and provides protection against failure and fluid leakage
- 37 • Demineralized water system - removes solids from raw water system to produce high quality, low
38 ion-content, water for steam boilers, and for the hydrogen peroxide feed system.
- 39 • Heating, ventilation, and air conditioning system - provides continuous heating, cooling, and air
40 humidity control throughout the ETF.

41 The following utilities support 200 Area ETF activities:

- 42 • Electrical power
- 43 • Sanitary water
- 44 • Communication systems
- 45 • Raw water

1 **C.3 CONTAINERS**

2 This section provides specific information on container storage and treatment operations at the 200 Area
3 ETF, including descriptions of containers, labeling, and secondary containment structures.

4 A list of dangerous and/or mixed waste managed in containers at the 200 Area ETF is presented in
5 Addendum A. The types of dangerous and/or mixed waste managed in containers in the 200 Area ETF
6 could include:

- 7 • Secondary waste powder generated from the treatment process
- 8 • Aqueous waste received from other Hanford site sources awaiting treatment
- 9 • Miscellaneous waste generated by operations and maintenance activities.

10 The secondary treatment train processes the waste by-products from the primary treatment train, which
11 are concentrated and dried into a powder. Containers are filled with dry powder waste from the thin film
12 dryer via a remotely controlled system. Containers of aqueous waste received from other Hanford site
13 sources are stored at 200 Area ETF until their contents can be transferred to the process for treatment.
14 The waste is usually transferred to the secondary waste receiving or concentration tanks. Miscellaneous
15 waste generated from maintenance and operations activities are stored at the ETF. The waste could
16 include process waste, such as used filter elements; spent RO membranes; damaged equipment, and
17 decontamination and maintenance waste, such as contaminated rags, gloves, and other personal protective
18 equipment. Containers of miscellaneous waste which have free liquids generally are packaged with
19 absorbents.

20 Several container collection areas could be located within the 200 Area ETF process and container
21 handling areas. These collection areas are used only to accumulate waste in containers. Once a container
22 is filled, the container is transferred to a container storage area (Figure C.3 and Figure C.4), to another
23 TSD unit, or to a less-than-90-day storage pad. Containers stored in the additional storage area
24 (Figure C.4) are elevated or otherwise protected from contact with accumulated liquids. The container
25 storage area within 200 Area ETF is a 22.9 x 8.5-meter room located adjacent to the 200 Area ETF
26 process areas. The containers within the container storage area are clearly labeled, and access to these
27 containers is limited by barriers and by administrative controls. The 200 Area ETF floor provides
28 secondary containment, and the 200 Area ETF roof and walls protects all containers from exposure to the
29 elements.

30 Waste also could be placed in containers for treatment as indicated in Addendum A. For example, sludge
31 that accumulates in the bottoms of the process tanks is removed periodically and placed into containers.
32 In this example, the waste is solidified by decanting the supernate from the container and the remainder of
33 the waste is allowed to evaporate, or absorbents are added, as necessary, to address remaining liquids.
34 Following treatment, this waste either is stored at the 200 Area ETF or transferred to another TSD unit.

35 **C.3.1 Description of Containers**

36 The containers used to collect and store dry powder waste are 208-liter steel containers. Most of the
37 aqueous waste received at 200 Area ETF, and maintenance and operation waste generated, are stored in
38 208-liter steel or plastic containers; however, in a few cases, the size of the container could vary to
39 accommodate the size of a particular waste. For example, some process waste, such as spent filters,
40 might not fit into a 208-liter container. In the case of spent resin from the IX columns, the resin is
41 dewatered, and could be packaged in a special disposal container. In these few cases, specially sized
42 containers could be required. In all cases, however, only approved containers are used and are compatible
43 with the associated waste. Typically, 208-liter containers are used for treatment.

44 Current operating practices indicate the use of new 208-liter containers that have either a polyethylene
45 liner or a protective coating. Any reused or reconditioned container is inspected for container integrity
46 before use. Overpack containers are available for use with damaged containers. Overpack containers
47 typically are unlined steel or polyethylene.

1 Per Addendum A, a maximum of 147,630 liters of dangerous and/or mixed waste could be stored in
2 containers in the 200 Area ETF.

3 **C.3.2 Container Management Practices**

4 Before use, each container is checked for signs of damage such as dents, distortion, corrosion, or
5 scratched coating. For dry powder loading, empty containers on pallets are raised by a forklift and
6 manually placed on the conveyor that transports the containers to the automatic filling station in the
7 container handling room (Figure C.14). The container lids are removed and replaced manually following
8 the filling sequence. After filling, containers exit the container handling room via the filled drum
9 conveyor. Locking rings are installed, the container label is affixed, and the container is moved by dolly
10 or forklift to the container storage area.

11 Before receipt at 200 Area ETF, each container from other Hanford site sources is inspected for leaks,
12 signs of damage, and a loose lid. The identification number on each container is checked to ensure the
13 proper container is received. The containers are typically placed on pallets and moved by dolly or forklift
14 to the container storage area. These containers are later moved to the process area and the contents
15 transferred to the process for treatment.

16 Containers used for storing maintenance and operations secondary waste are labeled before being placed
17 in the container storage area or in a collection area. Lids are secured on these containers when not being
18 filled. When the containers in a collection area are full, the containers are transferred by dolly or forklift
19 to the container storage area or to an appropriate TSD unit. Containers used for treating waste also are
20 labeled. The lids on these containers are removed as required to allow for treatment. During treatment,
21 access to these containers is controlled through physical barriers and/or administrative controls.

22 The filled containers in the container storage area are inventoried, checked for proper labeling, and placed
23 on pallets or in a separate containment device as necessary. Each pallet is moved by forklift. Within the
24 container storage area, palletized containers are stacked no more than three pallets high and in rows no
25 more than two containers wide. Unobstructed aisles with a minimum of 76-centimeter aisle space
26 separate rows.

27 **C.3.3 Container Labeling**

28 Labels are affixed on containers used to store dry powder when the containers leave the container
29 handling room. Labels are affixed on other waste containers before use. Every container is labeled with
30 the date that the container was filled. Appropriate major risk labels, such as "corrosive", "toxic", or
31 "F-listed", also are added. Each container also has a label with an identification number for tracking
32 purposes.

33 **C.3.4 Containment Requirements for Managing Containers**

34 Secondary containment is provided in the container management areas within the ETF. The secondary
35 containment provided for tank systems also serves the container management areas. This section
36 describes the design and operation of the secondary containment structure for these areas.

37 **C.3.4.1 Secondary Containment System Design**

38 For the container management areas, the reinforced concrete floor and a 15.2-centimeter rise (berm) along
39 the walls of the container storage area of the 200 Area ETF provides secondary containment. The
40 engineering assessment required for tanks (Mausshardt 1995) also describes the design and construction
41 of the secondary containment provided for the 200 Area ETF container management areas. All systems
42 were designed to national codes and standards (e.g., American Society for Testing Materials, American
43 Concrete Institute standards).

44 The floor is composed of cast-in-place, pre-formed concrete slabs, and has a minimum thickness of 15.2
45 centimeters. All slab joints and floor and wall joints have water stops installed at the mid-depth of the
46 slab. In addition, filler was applied to each joint. The floor and berms are coated with a chemically
47 resistant; high-solids epoxy coating system consisting of primer and top coating. This coating material is

1 compatible with the waste managed in containers and is an integral part of the secondary containment
2 system for containers.

3 The floor is sloped to drain any solution in the container storage area to floor drains along the west wall.
4 Each floor drain consists of a grating over a 20.3-centimeter diameter drain port connected to a 4-inch
5 polyvinyl chloride transfer pipe. The pipe passes under this wall and connects to a trench running along
6 the east wall of the adjacent process area. This trench drains solution to sump tank 1.

7 The container storage area is separated from the process area by a common wall and a door for access to
8 the two areas (Figure C.3). These two areas also share a common floor and trenches that, with the
9 15.2-centimeter rise of the containing walls, form the secondary containment system for the process area
10 and the container storage area.

11 **C.3.4.2 Structural Integrity of Base**

12 Engineering calculations were performed showing the floor of the container storage area is capable of
13 supporting the weight of containers. These calculations were reviewed and certified by a professional
14 engineer (Mausshardt 1995). The concrete was inspected for damage during construction. Cracks were
15 identified and repaired to the satisfaction of the professional engineer. Documentation of these
16 certifications is included in the engineering assessment (Mausshardt 1995).

17 **C.3.4.3 Containment System Capacity**

18 The container storage area is primarily used to store dry powder, aqueous waste awaiting treatment, and
19 maintenance and operation waste. Where appropriate, absorbents are added to fix any trace liquids
20 present. Large volumes of liquid are not stored in the container storage area. However, liquids might be
21 present in those containers that are in the treatment process. The maximum volume of waste that can be
22 stored in containers in the container storage area is 147,630 liters.

23 Because they are interconnected by floor drains, both the process area and the container storage area are
24 considered in the containment system capacity. The volume available for secondary containment in the
25 process area is approximately 68,000 liters, as discussed in the engineering assessment (Mausshardt
26 1995). Using the dimensions of the container storage area (~~22.9~~23.6 by 8.5 by ~~0.245~~ meters), and
27 assuming that 50 percent of the floor area is occupied by containers, the volume of the container storage
28 area is ~~14,900~~15,300 liters. The container handling area also provides 10,500 liters of containment as it is
29 connected to the other two areas. The combined volume of ~~both~~ the container storage area and process
30 areas, and container handling area available for secondary containment, ~~therefore,~~ is ~~82,900~~93,800 liters.
31 This volume is greater than 10 percent of the maximum total volume of containers allowed for storage in
32 the ETF, as discussed previously.

33 **C.3.4.4 Control of Run-on**

34 The container management areas are located within the ETF, which serves to prevent run-on of
35 precipitation.

36 **C.3.4.5 Removal of Liquids from Containment Systems**

37 The container storage area is equipped with drains that route solution to a trench in the process area,
38 which drains to sump tank 1. The sump tanks are equipped with alarms that notify operating personnel
39 that a leak is occurring. The sump tanks also are equipped with pumps to transfer waste to the surge tank
40 or the secondary treatment train.

41 **C.3.4.6 Prevention of Ignitable, Reactive, and Incompatible Wastes in Containers**

42 Individual waste types (i.e., ignitable, corrosive, and reactive) are stored in separate containers. A waste
43 that could be incompatible with other wastes is separated and protected from the incompatible waste.
44 Incompatible wastes are evaluated using the methodology documented in 40 CFR 264, Appendix V. For
45 example, acidic and caustic wastes are stored in separate containers. Free liquids are absorbed in
46 miscellaneous waste containers that hold incompatible waste. Additionally, ETF-specific packaging

1 requirements for these types of waste provide extra containment with each individual container. For
2 example, each item of acidic waste is individually bagged and sealed within a lined container.

3 **C.4 TANK SYSTEMS**

4 This section provides specific information on tank systems and process units. This section also includes a
5 discussion on the types of waste to be managed in the tanks, tank design information, integrity
6 assessments, and additional information on the 200 Area ETF tanks that treat and store dangerous and/or
7 mixed waste. The 200 Area ETF dangerous waste tanks are identified in Section 4C.4.1.1, and the
8 relative locations of the tanks and process units in the 200 Area ETF are presented in Figure C.3.

9 **C.4.1 Design Requirements**

10 The following sections provide an overview of the design specifications for the tanks within the ETF. A
11 separate discussion on the design of the process units also is provided. In accordance with the new tank
12 system requirements of [WAC 173-303-640\(3\)](#), the following tank components and specifications were
13 assessed:

- 14 • Dimensions, capacities, wall thicknesses, and pipe connections
- 15 • Materials of construction and linings and compatibility of materials with the waste being processed
- 16 • Materials of construction of foundations and structural supports
- 17 • Review of design codes and standards used in construction
- 18 • Review of structural design calculations, including seismic design basis
- 19 • Waste characteristics and the effects of waste on corrosion

20 This assessment was documented in the *Final RCRA Information Needs Report* (Mausshardt 1995; the
21 engineering assessment performed for the 200 Area ETF tank systems by an independent professional
22 engineer. A similar assessment of design requirements was performed for Load-in tanks 59A-TK-109
23 and -117 and is documented in *200 Area Effluent BAT/AKART Implementation, ETF Truck Load-in*
24 *Facility, Project W-291H Integrity Assessment Report* (KEH 1994). An assessment was also performed
25 when Load-in tank 59A-TK-1 was placed into service for receipt of dangerous and mixed wastes. The
26 assessment is documented in *200 Area ETF Purgewater Unloading Facility Tank System Integrity*
27 *Assessment* (HNF 2009a).

28 The specifications for the preparation, design, and construction of the tank systems at the 200 Area ETF
29 are documented in the *Design Construction Specification, Project C-018H, 242-A Evaporator/PUREX*
30 *Plant Process Condensate Treatment Facility* (WHC 1992a). The preparation, design, and construction
31 of Load-in tanks 59A-TK-109 and -117 are provided in the construction specifications in *Project W-291,*
32 *200 Area Effluent BAT/AKART Implementation ETF Truck Load-in Facility* (KEH 1994). The
33 preparation, design and construction of Load-in 59A-TK-1 are documented in *Purgewater Unloading*
34 *Facility Project Documentation* (HNF 2009b).

35 Most of the tanks in the 200 Area ETF are constructed of stainless steel. According to the design of the
36 ETF, it was determined stainless steel would provide adequate corrosion protection for these tanks.
37 Exceptions include Load-in tank 59A-TK-1, which is constructed of fiberglass-reinforced plastic and the
38 verification tanks, which are constructed of carbon steel with an epoxy coating. The 200 Area ETF
39 evaporator/vapor body (and the internal surfaces of the thin film dryer) is constructed of a corrosion
40 resistant alloy, known as alloy 625, to address the specific corrosion concerns in the secondary treatment
41 train. Finally, the hydrogen peroxide decomposer vessels are constructed of carbon steel and coated with
42 a vinyl ester lining.

43 The shell thicknesses of the tanks identified in Table C.5 represent a nominal thickness of a new tank
44 when placed into operation. The tank capacities identified in this table represent the maximum volumes.
45 Nominal tank volumes discussed below represent the maximum volume in a tank unit during normal
46 operations.

1 C.4.1.1 Codes and Standards for Tank System Construction

2 Specific standards for the manufacture of tanks and process systems installed in the 200 Area ETF are
3 briefly discussed in the following sections. In addition to these codes and industrial standards, a seismic
4 analysis for each tank and process system is required [[WAC 173-303-806\(4\)\(a\)\(xi\)](#)]. The seismic
5 analysis was performed in accordance with UCRL-15910 *Design and Evaluation Guidelines for*
6 *Department of Energy Facilities Subjected to Natural Phenomena Hazards*, Section 4 (UCRL 1987).
7 The results of the seismic analyses are summarized in the engineering assessment of the 200 Area ETF
8 tank systems (Mausshardt 1995).

9 **Storage and Treatment Tanks.** The following tanks store and/or treat dangerous waste at the ETF.

| 10 <u>Tank name</u> | <u>Tank number</u> |
|--|-------------------------|
| 11 Surge tank | 2025E-60A-TK-1 |
| 12 pH adjustment tank | 2025E-60C-TK-1 |
| 13 Effluent pH adjustment tank | 2025E-60C-TK-2 |
| 14 First RO feed tank | 2025E-60F-TK-1 |
| 15 Second RO feed tank | 2025E-60F-TK-2 |
| 16 Verification tanks (three) | 2025E-60H-TK-1A/1B/1C |
| 17 Secondary waste receiving tanks (two) | 2025E-60I-TK-1A/1B |
| 18 Evaporator (vapor body) | 2025E-601-EV-1 |
| 19 Concentrate tanks (two) | 2025E-60J-TK-1A/1B |
| 20 Sump tanks (two) | 2025E-20B-TK-1/2 |
| 21 Distillate flash tank | 2025E-60I-TK-2 |
| 22 Load-in tanks | 2025ED-59A-TK-1/109/117 |

23 The relative location of these tanks is presented in Figure C.3. These tanks are maintained at or near
24 atmospheric pressure. The codes and standards applicable to the design, construction, and testing of the
25 above tanks and ancillary piping systems are as follows:

26 ASME - B31.3 Chemical Plant and Petroleum Refinery Piping (ASME 1990)

27 ASME Sect. VIII, Division I Pressure Vessels (ASME 1992a)

28 AWS - D1.1 Structural Welding Code - Steel (AWS 1992)

29 ANSI - B16.5 Pipe Flanges and Flanged Fittings (ANSI 1992)

30 ASME Sect. IX Welding and Brazing Qualifications (ASME 1992b)

31 API 620 Design and Construction of Large Welded Low Pressure Storage Tanks (API 1990)

32 AWWA - D100 Welded Steel Tanks for Water Storage (AWWA 1989)

33 AWWA - D103 Factory-Coated Bolted Steel Tanks for Water Storage (AWWA 1987)

34 AWWA - D120 Thermosetting Fiberglass-Reinforced Plastic Tanks (AWWA 1984)

35 ASTM-D3299 Filament Wound Glass-Fiber-Reinforced Thermoset Resin Corrosion Resistant Tanks.

36
37 The application of these standards to the construction of 200 Area ETF tanks and independent verification
38 of completed systems ensured that the tank and tank supports had sufficient structural strength and that
39 seams and connections were adequate to ensure tank integrity. In addition, each tank met strict quality
40 assurance requirements. Each tank constructed offsite was tested for integrity and leak tightness before
41 shipment to the Hanford Facility. Following installation, the systems were inspected for damage to
42 ensure against leakage and to verify proper operation. If a tank was damaged during shipment or
43 installation, leak tightness testing was repeated onsite.

1 C.4.1.2 Design Information for Tanks Located Outside of Effluent Treatment Facility

2 The load-in tanks, surge tank, and verification tanks are located outside the ETF. These tanks are located
3 within concrete structures that provide secondary containment.

4 **Load-In Tanks and Ancillary Equipment.** The load-in tanks 59A-TK-109 and -117 are heated and
5 constructed of stainless steel, and have a nominal capacity of 31,000 liters. Load-in tank 59A-TK-1 is
6 heated and constructed of fiberglass reinforced plastic and has a nominal capacity of ~~24,200~~24,500 liters.
7 Load-in tanks 59A-TK-109 and -117 are located outside of the metal building while Load-in tank
8 59A-TK-1 is located inside the building. Ancillary equipment includes transfer pumps, filtration
9 systems, a double encased, fiberglass transfer pipeline, level instruments for tanker trucks, and leak
10 detection equipment. From the Load-In Station, aqueous waste can be routed to the surge tank or to the
11 LERF through a double-encased line. The load-in tanks, sump, pumps, and truck pad are all provided
12 with secondary containment.

13 **Surge Tank and Ancillary Equipment.** The surge tank is constructed of stainless steel and has a
14 nominal capacity of ~~421,000~~ 379,000 liters. Ancillary equipment to the surge tank includes two
15 underground double encased (i.e., pipe-within-a-pipe) transfer lines connecting to LERF and three pumps
16 for transferring aqueous waste to the primary treatment train. The surge tank is located at the south end of
17 the ETF. The surge tank is insulated and the contents heated to prevent freezing. Eductors in the tank
18 provide mixing.

19 **Verification Tanks and Ancillary Equipment.** The verification tanks are located north of the ETF.
20 The verification tanks have a nominal capacity of 2,749,760,000 liters each. For support, the tanks have a
21 center post with a webbing of beams that extend from the center post to the sides of the tank. The roof is
22 constructed of epoxy covered carbon steel that is attached to the cross beams of the webbing. The tank
23 floor also is constructed of epoxy covered carbon steel and is sloped. Eductors are installed in each tank
24 to provide mixing.

25 Ancillary equipment includes a return pump that provides circulation of treated effluent through the
26 eductors. The return pump also recycles effluent back to the 200 Area ETF for retreatment and can
27 provide service water for 200 Area ETF functions. Two transfer pumps are used to discharge treated
28 effluent to SALDS or back to the LERF.

29 C.4.1.3 Design Information for Tanks Located Inside the Effluent Treatment Facility 30 Building

31 Most of the 200 Area ETF tanks and ancillary equipment that store or treat dangerous and/or mixed waste
32 are located within the ETF. The structure serves as secondary containment for the tank systems.

33 **pH Adjustment Tank and Ancillary Equipment.** The pH adjustment tank has a nominal capacity of
34 ~~13,200~~16,000 liters. Ancillary equipment for this tank includes overflow lines to a sump tank and pumps
35 to transfer waste to other units in the main treatment train.

36 **Effluent pH Adjustment Tank and Ancillary Equipment.** The effluent pH adjustment tank has a
37 nominal capacity of ~~11,100~~13,700 liters. Ancillary equipment includes overflow lines to a sump tank and
38 pumps to transfer waste to the verification tanks.

39 **First and Second Reverse Osmosis Feed Tanks and Ancillary Equipment.** The first RO feed tank is a
40 vertical, stainless steel tank with a round bottom and has a nominal capacity of ~~16,19,700~~ liters.
41 Conversely, the second RO feed tank is a rectangular vessel with the bottom of the tank sloping sharply
42 to a single outlet in the bottom center. The second RO feed tank has a nominal capacity of 7, ~~8600~~ liters.
43 Each RO tank has a pump to transfer waste to the RO arrays. Overflow lines are routed to a sump tank.

44 **Secondary Waste Receiving Tanks and Ancillary Equipment.** Two nominal 69,000-liter secondary
45 waste receiving tanks collect waste from the units in the main treatment train, such as concentrate solution
46 (retentate) from the RO units and regeneration solution from the IX columns. These are vertical,

1 cylindrical tanks with a semi-elliptical bottom and a flat top. Ancillary equipment includes overflow lines
2 to a sump tank and pumps to transfer aqueous waste to the 200 Area ETF evaporator.

3 **Effluent Treatment Facility Evaporator and Ancillary Equipment.** The 200 Area ETF evaporator,
4 the principal component of the evaporation process, is a cylindrical pressure vessel with a conical bottom.
5 Aqueous waste is fed into the lower portion of the vessel. The top of the vessel is domed and the vapor
6 outlet is configured to prevent carryover of liquid during the foaming or bumping (violent boiling) at the
7 liquid surface. The 200 Area ETF evaporator has a nominal operating capacity of approximately
8 ~~16,08,500~~ liters.

9 The 200 Area ETF evaporator includes the following ancillary equipment:

- 10 • Preheater
- 11 • Recirculation pump
- 12 • Waste heater with steam level control tank
- 13 • Concentrate transfer pump
- 14 • Entrainment separator
- 15 • Vapor compressor with silencers
- 16 • Silencer drain pump.

17 **Distillate Flash Tank and Ancillary Equipment.** The distillate flash tank is a horizontal tank that has a
18 nominal operating capacity of ~~730-780~~ liters. Ancillary equipment includes a pump to transfer the
19 distillate to the surge tank for reprocessing.

20 **Concentrate Tanks and Ancillary Equipment.** Each of the two concentrate tanks has an approximate
21 nominal capacity of 22,700 liters. Ancillary equipment includes overflow lines to a sump tank and pumps
22 for recirculation and transfer.

23 **Sump Tanks.** Sump tanks 1 and 2 are located below floor level. Both sump tanks are double-walled,
24 rectangular tanks, placed inside concrete vaults. Both tanks have a working volume of 4,000 liters each.
25 The sump tanks are located in pits below grade to allow gravity drain of solutions to the tanks. Each
26 sump tank has two vertical pumps for transfer of waste to the secondary waste receiving tanks or to the
27 surge tank for reprocessing.

28 **C.4.1.4 Design Information for Effluent Treatment Facility Process Units**

29 As with the 200 Area ETF tanks, process units that treat and/or store dangerous and/or mixed waste are
30 maintained at or near atmospheric pressure. These units were constructed to meet a series of design
31 standards, as discussed in the following sections. Table C.6 presents the materials of construction and the
32 ancillary equipment associated with these process units. All piping systems are designed to withstand the
33 effects of internal pressure, weight, thermal expansion and contraction, and any pulsating flow. The
34 design and integrity of these units are presented in the engineering assessment (Mausshardt 1995).

35 **Filters.** The load-in fine and rough filter vessels (including the influent and auxiliary filters) are designed
36 to comply with the ASME Section VIII, Division I, Pressure Vessels (ASME 1992a). The application of
37 these standards to the construction of the 200 Area ETF filter system and independent inspection ensure
38 that the filter and filter supports have sufficient structural strength and that the seams and connections are
39 adequate to ensure the integrity of the filter vessels.

40 **Ultraviolet Oxidation System.** The UV/OX reaction chamber is designed to comply with manufacturers
41 standards.

42 **Degasification System.** The codes and standards applicable to the design, fabrication, and testing of the
43 degasification column are identified as follows:

- 44 • ASME - B31.3, Chemical Plant and Petroleum Refinery Piping (ASME 1990)
- 45 • AWS - D1.1, Structural Welding Code - Steel (AWS 1992)
- 46 • ANSI - B16.5, Pipe Flanges and Flanged Fittings (ANSI 1992)

1 **Reverse Osmosis System.** The pressure vessels in the RO unit are designed to comply with ASME
2 Section VIII, Division I, Pressure Vessels (ASME 1992a), and applicable codes and standards.

3 **Ion Exchange (Polishers).** The IX columns are designed in accordance with ASME Section VIII,
4 Division I, Pressure Vessels (ASME 1992a), and applicable codes and standards. Polisher piping is
5 fabricated of type 304 stainless steel or polyvinyl chloride (PVC) and meets the requirements of
6 ASME B31.3, Chemical Plant and Petroleum Refinery Piping (ASME 1990).

7 **Effluent Treatment Facility Evaporator.** The 200 Area ETF evaporator is designed to meet the
8 requirements of ASME Section VIII, Division I, Pressure Vessels (ASME 1992a), and applicable codes
9 and standards. The 200 Area ETF evaporator piping meets the requirements of ASME B31.3, Chemical
10 Plant and Petroleum Refinery Piping (ASME 1990).

11 **Thin Film Dryer System.** The thin film dryer is designed to meet the requirements of ASME
12 Section VIII, Division I, Pressure Vessels (ASME 1992a), and applicable codes and standards. The
13 piping meets the requirements of ASME - B31.3, Chemical Plant and Petroleum Refinery Piping
14 (ASME 1990).

15 **C.4.1.5 Integrity Assessments.**

16 The integrity assessment for 200 Area ETF (Mausshardt 1995) attests to the adequacy of design and
17 integrity of the tanks and ancillary equipment to ensure that the tanks and ancillary equipment will not
18 collapse, rupture, or fail over the intended life considering intended uses. For the load-in tanks, a similar
19 integrity assessment was performed (KEH 1995 and HNF 2009a). Specifically, the assessment
20 documents the following considerations:

- 21 • Adequacy of the standards used during design and construction of the facility
- 22 • Characteristics of the solution in each tank
- 23 • Adequacy of the materials of construction to provide corrosion protection from the solution in each
24 tank
- 25 • Results of the leak tests and visual inspections

26 The results of these assessments demonstrate that tanks and ancillary equipment have sufficient structural
27 integrity and are acceptable for storing and treating dangerous and/or mixed waste. The assessments also
28 state that the tanks and building were designed and constructed to withstand a design-basis earthquake.
29 Independent, qualified registered professional engineers certified these tank assessments.

30 The scope of the 200 Area ETF tank integrity assessment was based on characterization data from process
31 condensate. To assess the effect that other aqueous waste might have on the integrity of the 200 Area
32 ETF tanks, the chemistry of an aqueous waste will be evaluated for its potential to corrode a tank (e.g.,
33 chloride concentrations will be evaluated). The tank integrity assessment for the load-in tanks was based
34 on characterization data from several aqueous waste streams. The chemistry of an aqueous waste stream
35 not considered in the load-in tank integrity assessment also will be evaluated for the potential to corrode a
36 load-in tank.

37 Consistent with the recommendations of the integrity assessment, a corrosion inspection program was
38 developed. Periodic integrity assessments are scheduled for those tanks predicted to have the highest
39 potential for corrosion. These inspections are scheduled annually or longer, based on age of the tank
40 system, materials of construction, characteristics of the waste, operating experience, and
41 recommendations of the initial integrity assessment. These 'indicator tanks' include the concentrate
42 tanks, secondary waste receiving tanks, and verification tanks. One of each of these tanks will be
43 inspected yearly to determine if corrosion or coating failure has occurred. Should significant corrosion or
44 coating failure be found, an additional tank of the same type would be inspected during the same year. In
45 the case of the verification tanks, if corrosion or coating failure is found in the second tank, the third tank
46 also will be inspected. If significant corrosion were observed in all three sets of tanks, the balance of the

1 200 Area ETF tanks would be considered for inspection. For tanks predicted to have lower potential for
2 corrosion, inspections also are performed nonroutinely as part of the corrective maintenance program.

3 **C.4.2 Additional Requirements for New Tanks**

4 Procedures for proper installation of tanks, tank supports, piping, concrete, etc., are included in
5 *Construction Specification, Project C-018H, 242-A Evaporator/PUREX Plant Process Condensate*
6 *Treatment Facility* (WHC 1992a). For the load-in tanks, procedures are included in the construction
7 specifications in *Project W-291, 200 Area Effluent BAT/AKART Implementation ETF Truck Load-in*
8 *Facility* (KEH 1994) and *Purgewater Unloading Facility Project Documentation* (HNF 2009b).
9 Following installation, an independent, qualified, registered professional engineer inspected the tanks and
10 secondary containment. Deficiencies identified included damage to the surge tank, damage to the
11 verification tank liners, and 200 Area ETF secondary containment concrete surface cracking. All
12 deficiencies were repaired to the satisfaction of the engineer. The tanks and ancillary equipment were
13 leak tested as part of acceptance of the system from the construction contractor. Information on the
14 inspections and leak tests are included in the engineering assessment (Mausshardt 1995). No deficiencies
15 were identified during installation of the load-in tanks and ancillary equipment.

16 **C.4.3 Secondary Containment and Release Detection for Tank Systems**

17 This section describes the design and operation of secondary containment and leak detection systems at
18 the ETF.

19 **C.4.3.1 Secondary Containment Requirements for All Tank Systems**

20 The specifications for the preparation, design, and construction of the secondary containment systems at
21 the 200 Area ETF are documented (WHC 1992a). The preparation, design, and construction of the
22 secondary containment for the load-in tanks are provided in the construction specifications (KEH 1994
23 and HNF 2009b). All systems were designed to national codes and standards. Constructing the 200 Area
24 ETF per these specifications ensured that foundations are capable of supporting tank and secondary
25 containment systems and that uneven settling and failures from pressure gradients should not occur.

26 **C.4.3.1.1 Common Elements**

27 The following text describes elements of secondary containment that are common to all 200 Area ETF
28 tank systems. Details on the secondary containment for specific tanks, including leak detection systems
29 and liquids removal, are provided in Section 4C.4.4.1.2.

30 **Foundation and Construction.** For the tanks within the ETF, except for the sump tanks, secondary
31 containment is provided by a coated concrete floor and a 15.2-centimeter rise (berm) along the containing
32 walls. The double-wall construction of the sump tanks provides secondary containment. Additionally,
33 trenches are provided in the floor that also provides containment and drainage of any liquid to a sump pit.
34 For tanks outside the ETF, secondary containment also is provided with coated concrete floors in a
35 containment pit (load-in tanks) or surrounded by concrete dikes (the surge and verification tanks).

36 The transfer piping that carries aqueous waste into the 200 Area ETF is pipe-within-a-pipe construction,
37 and is buried approximately 1.2 meters below ground surface. The pipes between the verification tanks
38 and the verification tank pumps within the 200 Area ETF are located in a concrete pipe trench.

39 For this discussion, there are five discrete secondary containment systems associated with the following
40 tanks and ancillary equipment that treat or store dangerous waste:

- 41 • Load-in tanks
- 42 • Surge tank
- 43 • Process area (including sump tanks)
- 44 • Verification tanks
- 45 • Transfer piping and pipe trenches

1 All of the secondary containment systems are designed with reinforcing steel and base and berm thickness
2 to minimize failure caused by pressure gradients, physical contact with the waste, and climatic conditions.
3 Classical theories of structural analysis, soil mechanics, and concrete and structural steel design were used
4 in the design calculations for the foundations and structures. These calculations are maintained at the
5 ETF. In each of the analyses, the major design criteria from the following documents were included:

| | |
|-------------------|--|
| V-C018HC1-001 | Design Construction Specification, Project C-018H, 242A Evaporator/PUREX Plant Process Condensate Treatment Facility (WHC 1992a) |
| DOE Order 6430.1A | General Design Criteria |
| SDC-4.1 | Standard Architectural-Civil Design Criteria, Design Loads for Facilities (DOE-RL 1988) |
| UCRL-15910 | Design and Evaluation Guidelines for Department of Energy Facilities Subjected to Natural Phenomena Hazards (UCRL 1987) |
| UBC-91 | Uniform Building Code, 1991 Edition (ICBO 1991) |
| UBC-97 | Uniform Building Code, 1997 Edition (ICC 1997, for Load-in tank 59A-TK-1) |

6 The design and structural analysis calculations substantiate the structural designs in the referenced
7 drawings. The conclusions drawn from these calculations indicate that the designs are sound and that the
8 specified structural design criteria were met. This conclusion is verified in the independent design review
9 that was part of the engineering assessment (Mausshardt 1995, KEH 1994, and HNF 2009a).

10 **Containment Materials.** The concrete floor consists of cast-in-place and preformed concrete slabs. All
11 slab joints and floor and wall joints have water stops installed at the mid-depth of the slab. In addition,
12 filler was applied to each joint.

13 Except for the sump tank vaults, all of the concrete surfaces in the secondary containment system,
14 including berms, trenches, and pits, are coated with a chemical-resistant, high-solids, epoxy coating that
15 consists of a primer and a top coating. This coating material is compatible with the waste being treated,
16 and with the sulfuric acid, sodium hydroxide, and hydrogen peroxide additives to the process. The
17 coating protects the concrete from contact with any chemical materials that might be harmful to concrete
18 and prevents the concrete from being in contact with waste material. Table C.8 summarizes the specific
19 types of primer and top coats specified for the concrete and masonry surfaces in the ETF. The epoxy
20 coating is considered integral to the secondary containment system for the tanks and ancillary equipment.

21 The concrete containment systems are maintained such that any cracks, gaps, holes, and other
22 imperfections are repaired in a timely manner. Thus, the concrete containment systems do not allow
23 spilled liquid to reach soil or groundwater. There are a number of personnel doorways and vehicle access
24 points into the 200 Area ETF process areas. Releases of any spilled or leaked material to the environment
25 from these access points are prevented by 15.2-centimeter concrete curbs, sloped areas of the floor
26 (e.g., truck ramp), or trenches.

27 **Containment Capacity and Maintenance.** Each of these containment areas is designed to contain more
28 than 100 percent of the volume of the largest tank in each respective system. Secondary containment
29 systems for the surge tank, and the verification tanks, which are outside the ETF, also are large enough to
30 include the additional volume from a ~~100~~25-year, 24-hour storm event; i.e., 5.3 centimeters of
31 precipitation.

32 **Sprinkler System.** The sprinkler system within the 200 Area ETF supplies firewater protection to the
33 process area and the container storage area. This system is connected to a site wide water supply system
34 and has the capacity to supply sufficient water to suppress a fire at the ETF. However, in the event of
35 failure, the sprinkler system can be hooked up to another water source (e.g., tanker truck).

36 **C.4.3.1.2 Specific Containment Systems**

37 The following discussion presents a description of the individual containment systems associated with
38 specific tank systems.

1 **Load-In Tank Secondary Containment.** The load-in tanks 59A-TK-109 and -117 are mounted on a 46-
2 centimeter-thick reinforced concrete slab (Drawing H-2-817970). Secondary containment is provided by
3 a pit with 30.5-centimeter-thick walls and a floor constructed of reinforced concrete. The load-in tank pit
4 is sloped to drain solution to a sump. The depth of the pit varies with the slope of the floor, with an
5 average thickness of about 1.1 meters. The volume of the secondary containment is about ~~7973,000~~ liters,
6 which is capable of containing the volume of at least one load-in tank (i.e., 34,200 liters). Leaks are
7 detected by a leak detector that alarms locally, in the 200 Area ETF control room, and by visual
8 inspection of the secondary containment.

9 Adjacent to the pit is a 25.4-centimeter-thick reinforced concrete pad that serves as secondary
10 containment for the load-in tanker trucks, containers, transfer pumps, and filter system that serve as the
11 first tanker truck unloading bay. The pad is inside the metal Load-in building and is 15.2 centimeters
12 below grade with north and south walls gently sloped to allow truck access. The pad has a 3-inch drain
13 pipe to route waste solution to the adjacent load-in tank pit. The pad does not have protective coating
14 because it would experience excessive wear from the vehicle traffic.

15 Load-in tank 59A-TK-1 is located on a 25.4-centimeter-thick reinforced concrete slab (Drawing H-2-
16 817970) inside the metal Load-in building. The tank has a flat bottom which sits on a concrete slab in the
17 secondary containment. Secondary containment for the tank, filter system, and truck unloading piping is
18 provided by an epoxy coated catch basin with a capacity of about ~~3,5003,400~~ liters. The catch basin is
19 sloped to route solution from the catch basin through a 15.2-centimeter-wide by 14.3-centimeter-deep
20 trench to the adjacent truck unloading pad. This pad drains to the Load-in tank pit discussed above. The
21 volume of the combined secondary containment of these two systems is greater than ~~82,00076,400~~ liters,
22 which is capable of holding the volume of tank 59A-TK-1 (i.e., 26,000 liters).

23 Adjacent to tank 59A-TK-1 catch basin is a 25.4-centimeter-thick reinforced concrete pad that serves as
24 the second tanker truck unloading bay. The pad is inside the metal Load-in building and has a 2.4-meter
25 by 4.0-meter shallow, sloping pit to catch leaks during tanker truck unloading. The pit has a maximum
26 depth of 6.0 centimeters and a 15.2-centimeter-wide by 6.0-centimeter-deep trench to route leaks to the
27 adjacent tank 59A-TK-1 catch basin. The pad does not have protective coating because it would
28 experience excessive wear from the vehicle traffic.

29 **Surge Tank Secondary Containment.** The surge tank is mounted on a reinforced concrete ringwall.
30 Inside the ringwall, the flat-bottomed tank is supported by a bed of compacted sand and gravel with a
31 high-density polyethylene liner bonded to the ringwall. The liner prevents galvanic corrosion between the
32 soil and the tank. The secondary containment is reinforced concrete with a 15.2-centimeter thick floor
33 and a 20.3-centimeter thick dike. The secondary containment area shares part of the southern wall of the
34 main process area. The dike extends up 2.9 meters to provide a containment volume of ~~740856,000~~ liters
35 for the ~~452462,000~~-liter-surge tank.

36 The floor of the secondary containment slopes to a sump in the northwest corner of the containment area.
37 Leaks into the secondary containment are detected by level instrumentation in the sump, which alarms in
38 the 200 Area ETF control room, and/or by routine visual inspections. A sump pump is used to transfer
39 solution in the secondary containment to a sump tank.

40 **Process Area Secondary Containment.** The process area contains the tanks and ancillary equipment of
41 the primary and secondary treatment trains, and has a jointed, reinforced concrete slab floor. The
42 concrete floor of the process area provides the secondary containment. This floor is a minimum of
43 15.2 centimeters thick. With doorsills 15.2 centimeter high, the process area has a containment volume of
44 ~~approximately 93,800~~~~over 200,000~~ liters. The largest tanks in the process area are the secondary waste
45 receiving tanks, which each have a maximum capacity of 73,800 liters.

46 The floor of the process area is sloped to drain liquids to two trenches that drain to a sump. Each trench is
47 approximately 38.1 centimeters wide with a sloped trough varying from 39.4 to 76.2 centimeters deep.
48 Leaks into the secondary containment are detected by routine visual inspections of the floor area near the
49 tanks, ancillary equipment, and in the trenches.

1 A small dam was placed in the trench that comes from the thin film dryer room to contain minor liquid
2 spills originating in the dryer room to minimize the spread of contamination into the process area. The
3 dryer room is inspected for leaks in accordance with the inspection schedule in Addendum I. Operators
4 clean up these minor spills by removing the liquid waste and decontaminating the spill area.

5 A small dam was also placed in the trench adjacent to the chemical feed skid when the chemical berm
6 area was expanded to accommodate acid and caustic pumps, which were moved indoors from the top of
7 the surge tank to resolve a safety concern. This dam was designed to contain minor spills originating in
8 the chemical berm area and prevent them from entering the process sump.

9 The northwest corner of the process area consists of a pump pit containing the pumps and piping for
10 transferring treated effluent from the verification tanks to SALDS. The pit is built 1.37 meters below the
11 process area floor level and is sloped to drain to a trench built along its north wall that routes liquid to
12 sump tank 1. Leaks into the secondary containment of the pump pit are detected by routine visual
13 inspections.

14 **Sump Tanks.** The sump tanks support the secondary containment system, and collect waste from several
15 sources, including:

- 16 • Process area drain trenches
- 17 • Tank overflows and drains
- 18 • Container washing water
- 19 • Resin dewatering solution
- 20 • Steam boiler blow down
- 21 • Sampler system drains.

22 These double-contained tanks are located within unlined, concrete vaults. The sump tank levels are
23 monitored by remote level indicators or through visual inspections from the sump covers. These
24 indicators are connected to high- and low-level alarms that are monitored in the control room. When a
25 high-level alarm is activated, a pump is activated and the sump tank contents usually are routed to the
26 secondary treatment train for processing. The contents also could be routed to the surge tank for
27 treatment in the primary treatment train. In the event of an abnormally high inflow rate, a second sump
28 pump is initiated automatically.

29 **Verification Tank Secondary Containment.** The three verification tanks are each mounted on
30 ringwalls with high-density polyethylene liners similar to the surge tank. The secondary containment for
31 the three tanks is reinforced concrete with a 15.2-centimeter thick floor and a 20.3-centimeter thick dike.
32 The dike extends up 2.6 meters to provide a containment of approximately 3,390,000 liters 110 percent of
33 exceeding the capacity of a single verification tank (See Table C.5).

34 The floor of the secondary containment slopes to a sump along the southern wall of the dike. Leaks into
35 the secondary containment are detected by level instrumentation in the sump that alarms in the control
36 room and/or by routine visual inspections. A sump pump is used to transfer solution in the secondary
37 containment to a sump tank.

38 **C.4.3.2 Additional Requirements for Specific Types of Systems**

39 This section addresses additional requirements in WAC 173-303-640 for double-walled tanks like the
40 sump tanks and secondary containment for ancillary equipment and piping associated with the tank
41 systems.

42 **C.4.3.2.1 Double-Walled Tanks**

43 The sump tanks are the only tanks in the 200 Area ETF classified as 'double-walled' tanks. These tanks
44 are located in unlined concrete vaults and support the secondary containment system for the process area.
45 The sump tanks are equipped with a leak detector between the walls of the tanks that provide continuous
46 monitoring for leaks. The leak detector provides immediate notification through an alarm in the control
47 room. The inner tanks are contained completely within the outer shells. The tanks are contained

1 completely within the concrete structure of the 200 Area ETF so corrosion protection from external
2 galvanic corrosion is not necessary.

3 **C.4.3.2.2 Ancillary Equipment**

4 The secondary containment provided for the tanks and process systems also serves as secondary
5 containment for the ancillary equipment associated with these systems.

6 **Ancillary Equipment.** Section D.4.3.1.2 describes the secondary containment systems that also serve
7 most of the ancillary equipment within the 200 Area ETF. Between the 200 Area ETF and the
8 verification tanks, a pipeline trench provides secondary containment for four pipelines connecting the
9 transfer pumps (i.e., discharge and return pumps) in the 200 Area ETF with the verification tanks
10 (Figure C.2). This concrete trench crosses under the road and extends from the verification tank pumps to
11 the verification tanks. Treated effluent flows through these pipelines from the verification tank pumps to
12 the verification tanks. The return pump is used to return effluent to the 200 Area ETF for use as service
13 water or for reprocessing.

14 For all of the ancillary equipment housed within the ETF, the concrete floor, trenches, and berms form the
15 secondary containment system. For the ancillary equipment of the surge tank and the verification tanks,
16 secondary containment is provided by the concrete floors and dikes associated with these tanks. The
17 concrete floor and pit provide secondary containment for the ancillary equipment of the load-in tanks.

18 **Transfer Piping and Pipe Trenches.** The two buried transfer lines between LERF and the surge tank
19 have secondary containment in a pipe-within-a-pipe arrangement. The 4-inch transfer line has an 8-inch
20 outer pipe, while the 3-inch transfer, line has a 6-inch outer pipe. The pipes are fiberglass and are sloped
21 towards the surge tank. The outer piping ends with a drain valve in the surge tank secondary
22 containment.

23 These pipelines are equipped with leak detection located in the annulus between the inner and outer pipes;
24 the leak detection equipment can continuously 'inspect' the pipelines during aqueous waste transfers. The
25 alarms on the leak detection system are monitored in the control room. A low-volume air purge of the
26 annulus is provided to prevent condensation buildup and minimize false alarms by the leak detection
27 system. In the event that these leak detectors are not in service, the pipelines are inspected during
28 transfers by opening a drain valve to check for solution in the annular space between the inner and outer
29 pipe.

30 The 3-inch transfer line between the load-in tanks and the surge tank has a 6-inch outer pipe in a pipe-
31 within-a-pipe arrangement. The piping is made of fiberglass-reinforced plastic and slopes towards the
32 load-in tank secondary containment pit. The drain valve and leak detection system for the load-in tank
33 pipelines are operated similarly to the leak detection system for the LERF to 200 Area ETF pipelines.

34 As previously indicated, a reinforced concrete pipe trench provides secondary containment for piping
35 under the roadway between the 200 Area ETF and the verification tanks. Three 15.2 centimeter thick
36 reinforced concrete partitions divide the trench into four portions and support metal gratings over the
37 trench. Each portion of the trench is 1.2 meters wide, 0.76 meter deep, and slopes To route any solution
38 present to 4-inch drain lines through the north wall of the ETF building. These drain lines route solution
39 to sump tank 2 in ETF. The floor of the pipe trench is 30.5 centimeters thick and the sides are
40 15.2 centimeters thick. The concrete trenches are coated with water sealant and covered with metal
41 gratings at ground level to allow vehicle traffic on the roadway.

42 **C.4.4 Tank Management Practices**

43 When an aqueous waste stream is identified for treatment or storage at 200 Area ETF, the generating unit
44 is required to characterize the waste. Based on characterization data, the waste stream is evaluated to
45 determine if the stream is acceptable for treatment or storage. Specific tank management practices are
46 discussed in the following sections.

1 **C.4.4.1 Rupture, Leakage, Corrosion Prevention**

2 Most aqueous waste streams can be managed such that corrosion would not be a concern. For example,
3 an aqueous waste stream with high concentrations of chloride might cause corrosion problems when
4 concentrated in the secondary treatment train. One approach is to adjust the corrosion control measures in
5 the secondary treatment train. An alternative might be to blend this aqueous waste in a LERF basin with
6 another aqueous waste that has sufficient dissolved solids, such that the concentration of the chlorides in
7 the secondary treatment train would not pose a corrosion concern.

8 Additionally, the materials of construction used in the tanks systems (Table C.5) make it unlikely that an
9 aqueous waste would corrode a tank. For more information on corrosion prevention, refer to
10 Addendum B, Waste Analysis Plan.

11 If operating experience suggests that most aqueous waste streams can be managed such that corrosion
12 would not be a concern, operating practices and integrity assessment schedules and requirements will be
13 reviewed and modified as appropriate.

14 When a leak in a tank system is discovered, the leak is immediately contained or stopped by isolating the
15 leaking component. Following containment, the requirements of [WAC 173-303-640\(7\)](#), incorporated by
16 reference, are followed. These requirements include repair or closure of the tank/tank system component,
17 and certification of any major repairs.

18 **C.4.4.2 Overfilling Prevention**

19 Operating practices and administrative controls used at the 200 Area ETF to prevent overfilling a tank are
20 discussed in the following paragraphs. The 200 Area ETF process is controlled by the MCS. The MCS
21 monitors liquid levels in the 200 Area ETF tanks and has alarms that annunciate on high-liquid level to
22 notify operators that actions must be taken to prevent overfilling of these vessels. As an additional
23 precaution to prevent spills, many tanks are equipped with overflow lines that route solutions to sump
24 tanks 1 and 2. These tanks include the pH adjustment tank; RO feed tanks, effluent pH adjustment tank,
25 secondary waste receiving tanks, and concentrate tanks.

26 The following section discusses feed systems, safety cutoff devices, bypass systems, and pressure
27 controls for specific tanks and process systems.

28 **Tanks.** All tanks are equipped with liquid level sensors that give a reading of the tank liquid volume. All
29 of the tanks are equipped further with liquid level alarms that are actuated if the liquid volume is near the
30 tank overflow capacity. In the actuation of the surge tank alarm, a liquid level switch trips, sending a
31 signal to the valve actuator on the tank influent lines, and causing the influent valves to close.

32 The operating mode for each verification tank, i.e., receiving, holding, or discharging, can be designated
33 through the MCS; modes also switch automatically. When the high-level set point on the receiving
34 verification tank is reached, the flow to this tank is diverted and another tank becomes the receiver. The
35 full tank is switched into verification mode. The third tank is reserved for discharge mode.

36 The liquid levels in the pH adjustment, first and second RO feed, and effluent pH adjustment tanks are
37 maintained within predetermined operating ranges. Should any of these tanks overflow, the excess waste
38 is piped along with any leakage from the feed pumps to a sump tank.

39 When waste in a secondary waste-receiving tank reaches the high-level set point, the influent flow of
40 waste is redirected to the second tank. In a similar fashion, the concentrate tanks switch receipt modes
41 when the high-level set point of one tank is reached.

42 **Filter Systems.** All filters at 200 Area ETF (i.e., the Load-In Station, rough, fine, and auxiliary filter
43 systems) are in leak-tight steel casings. For the rough and fine filters, a high differential pressure, which
44 could damage the filter element, activates a valve that shuts off liquid flow to protect the filter element
45 from possible damage. To prevent a high-pressure situation, the filters are cleaned routinely with pulses
46 of compressed air that force water back through the filter. Cleaning is terminated automatically by
47 shutting off the compressed air supply if high pressure develops. The differential pressure across the

1 auxiliary filters also is monitored. A high differential pressure in these filters would result in a system
2 shutdown to allow the filters to be changed out.

3 The Load-In Station filtration system has pressure gauges for monitoring the differential pressure across
4 each filter. A high differential pressure would result in discontinuing filter operation until the filter is
5 replaced.

6 **Ultraviolet Light/Oxidation System and Decomposers.** A rupture disk on the inlet piping to each of
7 the UV/OX reaction vessels relieves to the pH adjustment tank in the event of excessive pressure
8 developing in the piping system. Should the rupture disk fail, the aqueous waste would trip the moisture
9 sensor, shut down the UV lamps, and close the surge tank feed valve. Also provided is a level sensor to
10 protect UV lamps against the risk of exposure to air. Should those sensors be actuated, the UV lamps
11 would be shut down immediately.

12 The piping and valving for the hydrogen peroxide decomposers are configured to split the waste flow:
13 half flows to one decomposer and half flows to the other decomposer. Alternatively, the total flow of
14 waste can be treated in one decomposer or both decomposers can be bypassed. A safety relief valve on
15 each decomposer vessel can relieve excess system pressure to a sump tank.

16 **Degasification System.** The degasification column is typically supplied aqueous waste feed by the pH
17 adjustment tank feed pump. This pump transfers waste solution through the hydrogen peroxide
18 decomposer, the fine filter, and the degasification column to the first RO feed tank.

19 The degasification column is designed for operation at a partial vacuum. A pressure sensor in the outlet
20 of the column detects the column pressure. The vacuum in the degasification column is maintained by a
21 blower connected to the vessel off gas system. The column is protected from extremely low pressure
22 developed by the column blower by the use of an intake vent that is maintained in the open position
23 during operation. The column liquid level is regulated by a flow control system with a high- and low-
24 level alarm. Plate-type heat exchanger cools the waste solution fed to the degasification column.

25 **Reverse Osmosis System.** The flow through the first and second RO stages is controlled to maintain
26 constant liquid levels in the first and second stage RO feed tanks.

27 **Polisher.** Typically, two of the three columns are in operation (lead/lag) and the third (regenerated)
28 column is in standby. When the capacity of the resin in the first column is exceeded, as detected by an
29 increase in the conductivity of the column effluent, the third column, containing freshly regenerated IX
30 resin, is brought online. The first column is taken offline, and the waste is rerouted to the second column,
31 and to the third. Liquid level instrumentation and automatically operated valves are provided in the IX
32 system to prevent overflowing.

33 **Effluent Treatment Facility Evaporator.** Liquid level instrumentation in the secondary waste receiving
34 tanks is designed to preclude a tank overflow. A liquid level switch actuated by a high-tank liquid level
35 causes the valves to reposition, closing off flow to the secondary waste receiving tanks. Secondary
36 containment for these tanks routes liquids to a sump tank.

37 Valves in the 200 Area ETF evaporator feed line can be positioned to bypass the secondary waste around
38 the 200 Area ETF evaporator and to transfer the secondary waste to the concentrate tanks.

39 **Thin Film Dryer.** The two concentrate tanks alternately feed the thin film dryer. Typically, one tank
40 serves as a concentrate waste receiver while the other tank serves as the dryer feed tank. One tank may
41 serve as both concentrate waste receiver and dryer feed tank. Liquid level instrumentation prevents tank
42 overflow by diverting the concentrate flow from the full concentrate tank to the other concentrate tank.
43 Secondary containment for these tanks routes liquids to a sump tank.

44 An alternate route is provided from the concentrate receiver tank to the secondary waste receiving tanks.
45 Dilute concentrate in the concentrate receiver tank can be reprocessed through the 200 Area ETF
46 evaporator by transferring the concentrate back to a secondary waste-receiving tank.

1 **C.4.5 Labels or Signs**

2 Each tank or process unit in the 200 Area ETF is identified by a nameplate attached in a readily visible
3 location. Included on the nameplate are the equipment number and the equipment title. Those tanks that
4 store or treat dangerous waste at the 200 Area ETF (Section 4C.4.1.1) are identified with a label, which
5 reads *PROCESS WATER/WASTE*. The labels are legible at a distance of at least fifty feet or as
6 appropriate for legibility within the ETF. Additionally, these tanks bear a legend that identifies the waste
7 in a manner, which adequately warns employees, emergency personnel, and the public of the major risk(s)
8 associated with the waste being stored or treated in the tank system(s).

9 Caution plates are used to show possible hazards and warn that precautions are necessary. Caution signs
10 have a yellow background and black panel with yellow letters and bear the word *CAUTION*. Danger
11 signs show immediate danger and signify that special precautions are necessary. These signs are red,
12 black, and white and bear the word *DANGER*.

13 Tanks and vessels containing corrosive chemicals are posted with black and white signs bearing the word
14 *CORROSIVE. DANGER - UNAUTHORIZED PERSONNEL KEEP OUT* signs are posted on all exterior
15 doors of the ETF, and on each interior door leading into the process area. Tank ancillary piping is also
16 labeled *PROCESS WATER* or *PROCESS LIQUID* to alert personnel which pipes in the process area
17 contains dangerous and/or mixed waste.

18 All tank systems holding dangerous waste are marked with labels or signs to identify the waste contained
19 in the tanks. The labels or signs are legible at a distance of at least 50-feet and bear a legend that
20 identifies the waste in a manner that adequately warns employees, emergency response personnel, and the
21 public, of the major risk(s) associated with the waste being stored or treated in the tank system(s).

22 **C.4.6 Air Emissions**

23 Tank systems that contain extremely hazardous waste that is acutely toxic by inhalation must be designed
24 to prevent the escape of such vapors. To date, no extremely hazardous waste has been managed in
25 200 Area ETF tanks and is not anticipated. However, the 200 Area ETF tanks have forced ventilation that
26 draws air from the tank vapor spaces to prevent exposure of operating personnel to any toxic vapors that
27 might be present. The vapor passes through a charcoal filter and two sets of high-efficiency particulate
28 air filters before discharge to the environment. The Load-in tanks and verification tanks are vented to the
29 atmosphere.

30 **C.4.7 Management of Ignitable or Reactive Wastes in Tanks Systems**

31 Although the 200 Area ETF is permitted to accept waste that is designated ignitable or reactive, such
32 waste would be treated or blended immediately after placement in the tank system so that the resulting
33 waste mixture is no longer ignitable or reactive. Aqueous waste received does not meet the definition of a
34 combustible or flammable liquid given in National Fire Protection Association (NFPA) code number
35 30 (NFPA 1996). The buffer zone requirements in NFPA-30, which require tanks containing combustible
36 or flammable solutions be a safe distance from each other and from public way, are not applicable.

37 **C.4.8 Management of Incompatible Wastes in Tanks Systems**

38 The 200 Area ETF manages dilute solutions that can be mixed without compatibility issues. The
39 200 Area ETF is equipped with several systems that can adjust the pH of the waste for treatment
40 activities. Sulfuric acid and sodium hydroxide are added to the process through the MCS for pH
41 adjustment to ensure there will be no large pH fluctuations and adverse reactions in the tank systems.

42 **C.5 SURFACE IMPOUNDMENTS**

43 This section provides specific information on surface impoundment operations at the LERF, including
44 descriptions of the liners and secondary containment structures, as required by [WAC 173-303-650](#) and
45 [WAC 173-303-806\(4\)\(d\)](#).

1 The LERF consists of three lined surface impoundments (basins) with a design operating capacity of
2 29.5 million liters each. The maximum capacity of each basin is 34 million liters. The dimensions of
3 each basin at the anchor wall are approximately 103 meters by 85 meters. The typical top dimensions of
4 the wetted area are approximately 89 meters by 71 meters, while the bottom dimensions are
5 approximately 57 by 38 meters. Total depth from the top of the dike to the bottom of the basin is
6 approximately 7 meters. The typical finished basin bottoms lie at about 4 meters below the initial grade
7 and 175 meters above sea level. The dikes separating the basins have a typical height of 3 meters and
8 typical top width of 11.6 meters around the perimeter of the impoundments.

9 **C.5.1 List of Dangerous Waste**

10 A list of dangerous and/or mixed aqueous waste that can be stored in LERF is presented in Addendum A.
11 Addendum B, Waste Analysis Plan also provides a discussion of the types of waste that are managed in
12 the LERF.

13 **C.5.2 Construction, Operation, and Maintenance of Liner System**

14 General information concerning the liner system is presented in the following sections. Information
15 regarding loads on the liner, liner coverage, UV light exposure prevention, and location relative to the
16 water table are discussed.

17 **C.5.2.1 Liner Construction Materials**

18 The LERF employs a double-composite liner system with a leachate detection, collection, and removal
19 system between the primary and secondary liners. Each basin is constructed with an upper or primary
20 liner consisting of a high-density polyethylene geomembrane laid over a bentonite carpet liner. The lower
21 or secondary liner in each basin is a composite of a geomembrane laid over a layer of soil/bentonite
22 admixture with a hydraulic conductivity less than 10^{-7} centimeters per second. The synthetic liners extend
23 up the dike wall to a concrete anchor wall that surrounds the basin at the top of the dike. A batten system
24 bolts the layers in place to the anchor wall (Figure C.16).

25 Figure C.17 is a schematic cross-section of the liner system. The liner components, listed from the top to
26 the bottom of the liner system, are the following:

- 27 • Primary 1.5-millimeter high-density polyethylene geomembrane
- 28 • Bentonite carpet liner
- 29 • Geotextile
- 30 • Drainage gravel (bottom) and geonet (sides)
- 31 • Geotextile
- 32 • Secondary 1.5-millimeter high-density polyethylene geomembrane
- 33 • Soil/bentonite admixture (91 centimeters on the bottom, 107 centimeters on the sides)
- 34 • Geotextile

35 The primary geomembrane, made of 1.5-millimeter high-density polyethylene, forms the basin surface
36 that holds the aqueous waste. The secondary geomembrane, also 1.5-millimeter high-density
37 polyethylene, forms a barrier surface for leachate that might penetrate the primary liner. The high-density
38 polyethylene chemically is resistant to constituents in the aqueous waste and has a relatively high strength
39 compared to other lining materials. The high-density polyethylene resin specified for the LERF contains
40 carbon black, antioxidants, and heat stabilizers to enhance its resistance to the degrading effects of UV
41 light. The approach to ensuring the compatibility of aqueous waste streams with the LERF liner materials
42 and piping is discussed in Addendum B, Waste Analysis Plan.

43 Three geotextile layers are used in the LERF liner system. The layers are thin, nonwoven polypropylene
44 fabric that chemically is resistant, highly permeable, and resistant to microbiological growth. The first
45 two layers prevent fine soil particles from infiltrating and clogging the drainage layer. The second
46 geotextile also provides limited protection for the secondary geomembrane from the drainage rock. The
47 third geotextile layer prevents the mixing of the soil/bentonite admixture with the much more porous and
48 granular foundation material.

1 A 30.5-centimeters-thick gravel drainage layer on the bottom of the basins between the primary and
2 secondary liners provides a flow path for liquid to the leachate detection, collection, and removal system.
3 A geonet (or drainage net) is located immediately above the secondary geomembrane on the basin
4 sidewalls. The geonet functions as a preferential flow path for liquid between the liners, carrying liquid
5 down to the gravel drainage layer and subsequently to the leachate sump. The geonet is a mesh made of
6 high-density polyethylene, with approximately 13-millimeter openings.

7 The soil/bentonite layer is 91 centimeters thick on the bottom of the basins and 107 centimeters thick on
8 the basin sidewalls; its permeability is less than 10^{-7} centimeters per second. This composite liner design,
9 consisting of a geomembrane laid over essentially impermeable soil/bentonite, is considered best
10 available technology for solid waste landfills and surface impoundments. The combination of synthetic
11 and clay liners is reported in the literature to provide the maximum protection from waste migration
12 (Forseth and Kmet 1983).

13 A number of laboratory tests were conducted to measure the engineering properties of the soil/bentonite
14 admixture, in addition to extensive field tests performed on three test fills constructed near the LERF site.
15 For establishing an optimum ratio of bentonite to soil for the soil/bentonite admixture, mixtures of various
16 ratios were tested to determine permeability and shear strength. A mixture of 12 percent bentonite was
17 selected for the soil/bentonite liner and tests described in the following paragraphs demonstrated that the
18 admixture meets the desired permeability of less than 10^{-7} centimeters per second. Detailed discussion of
19 test procedures and results is provided in Report of Geotechnical Investigation, 242-A Evaporation and
20 PUREX Interim Storage Basins (Chen-Northern 1990).

21 Direct shear tests were performed according to ASTM D3080 test procedures (ASTM 1990) on
22 soil/bentonite samples of various ratios. Based on these results, the conservative minimum Mohr-
23 Coulomb shear strength value of 30 degrees was estimated for a soil/bentonite admixture containing
24 12 percent bentonite.

25 The high degree of compaction of the soil/bentonite layer [92 percent per ASTM D1557 (ASTM 1991)]
26 was expected to maximize the bonding forces between the clay particles, thereby minimizing moisture
27 transport through the liner. With respect to particle movement ('piping'), estimated fluid velocities in this
28 low-permeability material are too low to move the soil particles. Therefore, piping is not considered a
29 problem.

30 For the soil/bentonite layer, three test fills were constructed to demonstrate that materials, methods, and
31 procedures used would produce a soil/bentonite liner that meets the EPA permeability requirement of less
32 than 10^{-7} centimeters per second. All test fills met the EPA requirements. A thorough discussion of
33 construction procedures, testing, and results is provided in *Report of Permeability Testing, Soil-bentonite*
34 *Test Fill* (Chen-Northern 1991a).

35 The aqueous waste stored in the LERF is typically a dilute mixture of organic and inorganic constituents.
36 Though isolated instances of soil liner incompatibility have been documented in the literature (Forseth
37 and Kmet 1983), these instances have occurred with concentrated solutions that were incompatible with
38 the geomembrane liners in which the solutions were contained. Considering the dilute nature of the
39 aqueous waste that is and will be stored in LERF and the moderate pH, and test results demonstrating the
40 compatibility of the high-density polyethylene liners with the aqueous waste [9090 Test Results
41 (WHC 1991)], gross failure of the soil/bentonite layer is not probable.

42 Each basin also is equipped with a floating very low-density polyethylene cover. The cover is anchored
43 and tensioned at the concrete wall at the top of the dikes, using a patented mechanical tensioning system.
44 Figure C.16 depict the tension mechanism and the anchor wall at the perimeter of each basin. Additional
45 information on the cover system is provided in Section C.5.2.5.

46 **C.5.2.1.1 Material Specifications**

47 Material specifications for the liner system and leachate collection system, including liners, drainage
48 gravel, and drainage net are discussed in the following sections. Material specifications are documented

1 in the *Final Specifications 242-A Evaporator and PUREX Interim Retention Basins* (KEH 1990a) and
2 *Construction Specifications for 242-A Evaporator and PUREX Interim Retention Basins* (KEH 1990b).

3 **Geomembrane Liners.** The high-density polyethylene resin for geomembranes for the LERF meets the
4 material specifications listed in Table C.9. Key physical properties include thickness (1.5 millimeters
5 [60 mil]) and impermeability (hydrostatic resistance of over 360,000 kilogram per square meter).
6 Physical properties meet National Sanitation Foundation Standard 54 (NSF 1985). Testing to determine
7 if the liner material is compatible with typical dilute waste solutions was performed and documented in
8 *9090 Test Results* (WHC 1991).

9 **Soil/Bentonite Liner.** The soil/bentonite admixture consists of 11.5 to 14.5 percent bentonite mixed into
10 well-graded silty sand with a maximum particle size of 4.75 millimeters (No. 4 sieve). Test fills were
11 performed to confirm the soil/bentonite admixture applied at LERF has hydraulic conductivity less than
12 10^{-7} centimeters per second, as required by [WAC 173-303-650\(2\)\(j\)](#) for new surface impoundments.

13 **Bentonite Carpet Liner.** The bentonite carpet liner consists of bentonite (90 percent sodium
14 montmorillonite clay) in a primary backing of woven polypropylene with nylon filler fiber, and a cover
15 fabric of open weave spunlace polyester. The montmorillonite is anticipated to retard migration of
16 solution through the liner, exhibiting a favorable cation exchange for adsorption of some constituents
17 (such as ammonium). Based on composition of the bentonite carpet and of the type of aqueous waste
18 stored at LERF, no chemical attack, dissolution, or degradation of the bentonite carpet liner is anticipated.

19 **Geotextile.** The nonwoven geotextile layers consist of long-chain polypropylene polymers containing
20 stabilizers and inhibitors to make the filaments resistant to deterioration from UV light and heat exposure.
21 The geotextile layers consist of continuous geotextile sheets held together by needle punching. Edges of
22 the fabric are sealed or otherwise finished to prevent outer material from pulling away from the fabric or
23 raveling.

24 **Drainage Gravel.** The drainage layer consists of thoroughly washed and screened, naturally occurring
25 rock meeting the size specifications for Grading Number 5 in Washington State Department of
26 Transportation construction specifications (WSDOT 1988). The specifications for the drainage layer are
27 given in Table C.10. Hydraulic conductivity tests (Chen-Northern 1992a, 1992b, 1992c) showed the
28 drainage rock used at LERF met the sieve requirements and had a hydraulic conductivity of at least
29 1 centimeter per second, which exceeded the minimum of at least 0.1 centimeters per second required by
30 [WAC 173-303-650\(2\)\(j\)](#) for new surface impoundments.

31 **Geonet.** The geonet is fabricated from two sets of parallel high-density polyethylene strands, spaced
32 1.3 centimeters center-to-center maximum to form a mesh with minimum two strands per 2.54 centimeter
33 in each direction. The geonet is located between the liners on the sloping sidewalls to provide a
34 preferential flow path for leachate to the drainage gravel and subsequently to the leachate sump.

35 **Leachate Collection Sump.** Materials used to line the 3.0-meter by 1.8-meter by 0.30-meter-deep
36 leachate sump, at the bottom of each basin in the northwest corner, include [from top to bottom
37 (Figure C.18)]:

- 38 • 25 millimeter high-density polyethylene flat stock (supporting the leachate riser pipe)
- 39 • Geotextile
- 40 • 1.5-millimeter high-density polyethylene rub sheet
- 41 • Secondary composite liner:
 - 42 – 1.5-millimeter high-density polyethylene geomembrane
 - 43 – 91 centimeters of soil/bentonite admixture
 - 44 – Geotextile

45 Specifications for these materials are identical to those discussed previously.

46 **Leachate System Risers.** Risers for the leachate system consist of 10-inch and 4-inch pipes from the
47 leachate collection sump to the catch basin northwest of each basin (Figure C.18). The risers lay below

1 the primary liner in a gravel-filled trench that also extends from the sump to the concrete catch basin
2 (Figure C.19).

3 The risers are high-density polyethylene pipes fabricated to meet the requirements in ASTM D1248
4 (ASTM 1989). The 10-inch riser is perforated every 20.3 centimeters with 1.3-centimeter holes around
5 the diameter. Level sensors and leachate pump are inserted in the 10-inch riser to monitor and remove
6 leachate from the sump. To prevent clogging of the pump and piping with fine particulate, the end of the
7 riser is encased in a gravel-filled box constructed of high-density polyethylene geonet and wrapped in
8 geotextile. The 4-inch riser is perforated every 10.2 centimeters with 0.64-centimeter holes around the
9 diameter. A level detector is inserted in the 4-inch riser.

10 **Leachate Pump.** A deep-well submersible pump, designed to deliver approximately 110 liters per
11 minute, is installed in the 10-inch leachate riser in each basin. Wetted parts of the leachate pump are
12 made of 316L stainless steel, providing both corrosion resistance and durability.

13 **C.5.2.1.2 Loads on Liner System**

14 The LERF liner system is subjected to the following types of stresses.

15 **Stresses from Installation or Construction Operations.** Contractors were required to submit
16 construction quality control plans that included procedures, techniques, tools, and equipment used for the
17 construction and care of liner and leachate system. Methods for installation of all components were
18 screened to ensure that the stresses on the liner system were kept to a minimum.

19 Calculations were performed to estimate the risk of damage to the secondary high-density polyethylene
20 liner during construction (*Calculations for LERF Part B Permit Application* [HNF 1997]). The greatest
21 risk expected was from spreading the gravel layer over the geotextile layer and secondary geomembrane.
22 The results of the calculations show that the strength of the geotextile was sufficiently high to withstand
23 the stress of a small gravel spreader driving on a minimum of 15 centimeters of gravel over the geotextile
24 and geomembrane. The likelihood of damage to the geomembrane lying under the geotextile was
25 considered low.

26 To avoid driving heavy machinery directly on the secondary liner, a 28-meter conveyer was used to
27 deliver the drainage gravel into the basins. The gravel was spread and consolidated by hand tools and a
28 bulldozer. The bulldozer traveled on a minimum thickness of 30.5 centimeters of gravel. Where the
29 conveyer assembly was placed on top of the liner, cribbing was placed to distribute the conveyer weight.
30 No heavy equipment was allowed for use directly in contact with the geomembranes.

31 Additional calculations were performed to estimate the ability of the leachate riser pipe to withstand the
32 static and dynamic loading imposed by lightweight construction equipment riding on the gravel layer
33 (HNF 1997). Those calculations demonstrated that the pipe could buckle under the dynamic loading of
34 small construction equipment; therefore, the pipe was avoided by equipment during spreading of the
35 drainage gravel.

36 Installation of synthetic lining materials proceeded only when winds were less than 24 kilometers per
37 hour, and not during precipitation. The minimum ambient air temperature for unfolding or unrolling the
38 high-density polyethylene sheets was -10 C, and a minimum temperature of 0 C was required for seaming
39 the high-density polyethylene sheets. Between shifts, geomembranes and geotextile were anchored with
40 sandbags to prevent lifting by wind. Calculations were performed to determine the appropriate spacing of
41 sandbags on the geomembrane to resist lifting caused by 130 kilometer per hour winds (HNF 1997). All
42 of the synthetic components contain UV light inhibitors and no impairment of performance is anticipated
43 from the short-term UV light exposure during construction. Section C.5.2.4 provides further detail on
44 exposure prevention.

45 During the laying of the soil/bentonite layer and the overlying geomembrane, moisture content of the
46 admixture was monitored and adjusted to ensure optimum compaction and to avoid development of
47 cracks.

1 **C.5.2.1.3 Static and Dynamic Loads and Stresses from the Maximum Quantity of Waste**

2 When a LERF basin is full, liquid depth is approximately 6.4 meters. Static load on the primary liner is
3 roughly 6,400 kilograms per square meter. Load on the secondary liner is slightly higher because of the
4 weight of the gravel drainage layer. Assuming a density of 805 kilograms per square meter for the
5 drainage gravel [conservative estimate based on specific gravity of 2.65 (Ambrose 1988)], the secondary
6 high-density polyethylene liner carries approximately 7,200 kilograms per square meter when a basin is
7 full.

8 Side slope liner stresses were calculated for each of the layers in the basin sidewalls and for the pipe
9 trench on the northwest corner of each basin (HNF 1997). Results of these calculations indicate factors of
10 safety against shear were 1.5 or greater for the primary geomembrane, geotextile, geonet, and secondary
11 geomembrane.

12 Because the LERF is not located in an area of seismic concern, as identified in Appendix VI of
13 [40 CFR 264](#) and [WAC 173-303-282\(6\)\(a\)\(I\)](#), discussion and calculation of potential seismic events are
14 not required.

15 **C.5.2.1.4 Stresses Resulting from Settlement, Subsidence, or Uplift**

16 Uplift stresses from natural sources are expected to have negligible impact on the liner. Groundwater lies
17 approximately 62 meters below the LERF, average annual precipitation is only 16 centimeters, and the
18 average unsaturated permeability of the soils near the basin bottoms is high, ranging from about
19 5.5×10^4 centimeters per second to about 1 centimeter per second (Chen-Northern 1991b). Therefore, no
20 hydrostatic uplift forces are expected to develop in the soil underneath the basins. In addition, the soil
21 under the basins consists primarily of gravel and sand, and contains few or no organic constituents.
22 Therefore, uplift caused by gas production from organic degradation is not anticipated.

23 Based on the design of the soil-bentonite liner, no structural uplift stresses are present within the lining
24 system (Chen-Northern 1991b).

25 Regional subsidence is not anticipated because neither petroleum nor extractable economic minerals are
26 present in the strata underlying the LERF basins, nor is karst (erosive limestone) topography present.

27 Dike soils and soil/bentonite layers were compacted thoroughly and proof-rolled during construction.
28 Calculation of settlement potential showed that combined settlement for the foundation and soil/bentonite
29 layer is expected to be about 2.7 centimeters. Settlement impact on the liner and basin stability is
30 expected to be minimal (Chen-Northern 1991b).

31 **C.5.2.1.5 Internal and External Pressure Gradients**

32 Pressure gradients across the liner system from groundwater are anticipated to be negligible. The LERF
33 is about 62 meters above the seasonal high water table, which prevents buildup of water pressure below
34 the liner. The native gravel foundation materials of the LERF are relatively permeable and free draining.
35 The 2 percent slope of the secondary liner prevents the pooling of liquids on top of the secondary liner.
36 Finally, the fill rate of the basins is slow enough (average 190 liters per minute) that the load of the liquid
37 waste on the primary liner is gradually and evenly distributed.

38 To prevent the buildup of gas between the liners, each basin is equipped with 21 vents in the primary
39 geomembrane located above the maximum water level that allow the reduction of any excess gas
40 pressure. Gas passing through these vents exit through a single pipe that penetrates the anchor wall into a
41 carbon adsorption filter. This filter extracts nearly all of the organic compounds, ensuring that emissions
42 to the air from the basins are not toxic.

43 **C.5.2.2 Liner System Location Relative to High-Water Table**

44 The lowest point of each LERF basin is the northwest corner of the sump, where the typical subgrade
45 elevation is 175 meters above mean sea level. Based on data collected from the groundwater monitoring
46 wells at the LERF site, the seasonal high-water table is located approximately 62 meters or more below

1 the lowest point of the basins. This substantial thickness of unsaturated strata beneath the LERF provides
2 ample protection to the liner from hydrostatic pressure because of groundwater intrusion into the
3 soil/bentonite layer. Further discussion of the unsaturated zone and site hydrogeology is provided in
4 Addendum D, Groundwater Monitoring Plan.

5 **C.5.2.3 Liner System Foundation**

6 Foundation materials are primarily gravels and cobbles with some sand and silt. The native soils onsite
7 are derived from unconsolidated Holocene sediments. These sediments are fluvial and glaciofluvial sands
8 and gravels deposited during the most recent glacial and postglacial event. Grain-size distributions and
9 shape analyses of the sediments indicate that deposition occurred in a high-energy environment (Chen-
10 Northern 1990).

11 Analysis of five soil borings from the LERF site was conducted to characterize the natural foundation
12 materials and to determine the suitability of onsite soils for construction of the impoundment dikes and
13 determine optimal design factors. Well-graded gravel containing varying amounts of silt, sand, and
14 cobbles comprises the layer in which the basins were excavated. This gravel layer extends to depths of
15 10 to 11 meters below land surface (Chen-Northern 1990). The basins are constructed directly on the
16 subgrade. Excavated soils were screened to remove oversize cobbles (greater than 15 centimeters in the
17 largest dimension) and used to construct the dikes.

18 Settlement potential of the foundation material and soil/bentonite layer was found to be low. The
19 foundation is comprised of undisturbed native soils. The bottom of the basin excavation lies within the
20 well-graded gravel layer, and is dense to very dense. Below the gravel is a layer of dense to very dense
21 poorly graded and well-graded sand. Settlement was calculated for the gravel foundation soils and for the
22 soil/bentonite layer, under the condition of hydrostatic loading from 6.4 meters of fluid depth. The
23 combined settlement for the soils and the soil/bentonite layer is estimated to be about 2.7 centimeters.
24 This amount of settlement is expected to have minimal impact on overall liner or basin stability
25 (Chen-Northern 1991b). Settlement calculations are provided in *Calculations for Liquid Effluent*
26 *Retention Facility Part B Permit Application* (HNF 1997).

27 The load bearing capacity of the foundation material, based on the soil analysis discussed previously, is
28 estimated at about 48,800 kilograms per square meter [maximum advisable presumptive bearing capacity
29 (Hough 1969)]. Anticipated static and dynamic loading from a full basin is estimated to be less than
30 9,000 kilograms per square meter (Section C.5.2.1.3), which provides an ample factor of safety.

31 When the basins are empty, excess hydrostatic pressure in the foundation materials under the liner system
32 theoretically could result in uplift and damage. However, because the native soil forming the foundations
33 is unsaturated and relatively permeable, and because the water table is located at a considerable depth
34 beneath the basins, any infiltration of surface water at the edge of the basin is expected to travel
35 predominantly downward and away from the basins, rather than collecting under the excavation itself.
36 No gas is expected in the foundation because gas-generating organic materials are not present.

37 Subsidence of undisturbed foundation materials is generally the result of fluid extraction (water or
38 petroleum), mining, or karst topography. Neither petroleum, mineral resources, nor karst are believed to
39 be present in the sediments overlying the Columbia River basalts. Potential groundwater resources do
40 exist below the LERF. Even if these sediments were to consolidate from fluid withdrawal, their depth
41 most likely would produce a broad, gently sloping area of subsidence that would not cause significant
42 strains in the LERF liner system. Consequently, the potential for subsidence related failures are expected
43 to be negligible.

44 Borings at the LERF site, and extensive additional borings in the 200 East Area, have not identified any
45 significant quantities of soluble materials in the foundation soil or underlying sediments (Last et al. 1989).
46 Consequently, the potential for sinkholes is considered negligible.

1 **C.5.2.4 Liner System Exposure Prevention**

2 Both primary and secondary geomembranes and the floating cover are stabilized with carbon black to
3 prevent degradation from UV light. Furthermore, none of the liner layers experience long-term exposure
4 to the elements. During construction, thin polyethylene sheeting was used to maintain optimum moisture
5 content and provide protection from the wind for the soil/bentonite layer until the secondary
6 geomembrane was laid in place. The secondary geomembrane was covered by the geonet and geotextile
7 as soon as quality control testing was complete. Once the geotextile layer was completed, drainage
8 material immediately was placed over the geotextile. The final (upper) geotextile layer was placed over
9 the drainage gravel and immediately covered by the bentonite carpet liner. This was covered
10 immediately, in turn, by the primary high-density polyethylene liner.

11 Both high-density polyethylene liners, geotextile layers, and geonet are anchored permanently to a
12 concrete wall at the top of the basin berm. During construction, liners were held in place with many
13 sandbags on both the basin bottoms and side slopes to prevent wind from lifting and damaging the
14 materials. Calculations were performed to determine the amount of fluid needed in a basin to prevent
15 wind lift damage to the primary geomembrane. Approximately 15 to 20 centimeters of solution are kept
16 in each basin to minimize the potential for uplifting the primary liner (HNF 1997).

17 The entire lining system is covered by a very low-density polyethylene floating cover that is bolted to the
18 concrete anchor wall. The floating cover prevents evaporation and intrusion from dust, precipitation,
19 vegetation, animals, and birds. A patented tensioning system is employed to prevent wind from lifting the
20 cover and automatically accommodate changes in liquid level in the basins. The cover tension
21 mechanism consists of a cable running from the flexible geosynthetic cover over a pulley on the tension
22 tower (located on the concrete anchor wall) to a dead man anchor. These anchors (blocks) simply hang
23 from the cables on the exterior side of the tension towers. The anchor wall also provides for solid
24 attachment of the liner layers and the cover, using a 6.4-millimeter batten and neoprene gasket to bolt the
25 layers to the concrete wall, effectively sealing the basin from the intrusion of light, precipitation, and
26 airborne dust (Figure C.16).

27 The floating cover, made of very low-density polyethylene with UV light inhibitors, is not anticipated to
28 experience unacceptable degradation during the service life of the LERF. The very low-density
29 polyethylene material contains carbon black for UV light protection, anti-oxidants to prevent heat
30 degradation, and seaming enhancers to improve its ability to be welded. A typical manufacturer's limited
31 warranty for weathering of very low-density polyethylene products is 20 years (Poly America, undated).
32 This provides a margin of safety for the anticipated medium-term use of the LERF for aqueous waste
33 storage.

34 The upper 3.4 to 4.6 meters of the sidewall liner also could experience stresses in response to temperature
35 changes. Accommodation of thermal influences for the LERF geosynthetic layers is affected by inclusion
36 of sufficient slack as the liners were installed. Calculations demonstrate that approximately
37 67 centimeters of slack is required in the long basin bottom dimension, 46 centimeters across the basin,
38 and 34 centimeters from the bottom of the basin to the top of the basin wall (HNF 1997).

39 Thermal stresses also are experienced by the floating cover. As with the geomembranes, sufficient slack
40 was included in the design to accommodate thermal contraction and expansion.

41 **C.5.2.4.1 Liner Repairs During Operations**

42 Should repair of a basin liner be required while the basin is in operation, the basin contents will be
43 transferred to the 200 Area ETF or another available basin. After the liner around the leaking section is
44 cleaned, repairs to the geomembrane will be made by the application of a piece of high-density
45 polyethylene sheeting, sufficient in size to extend approximately 8 to 15 centimeters beyond the damaged
46 area, or as recommended by the vendor. A round or oval patch will be installed using the same type of
47 equipment and criteria used for the initial field installations.

1 **C.5.2.4.2 Control of Air Emissions**

2 The floating covers limit evaporation of aqueous waste and releases of volatile organic compounds into
3 the atmosphere. To accommodate volumetric changes in the air between the fluid in the basin and the
4 cover, and to avoid problems related to 'sealing' the basins too tightly, each basin is equipped with a
5 carbon filter breather vent system. Any air escaping from the basins must pass through this vent,
6 consisting of a pipe that penetrates the anchor wall and extends into a carbon adsorption filter unit.

7 **C.5.2.5 Liner Coverage**

8 The liner system covers the entire ground surface that underlies the retention basins. The primary liner
9 extends up the side slopes to a concrete anchor wall at the top of the dike encircling the entire basin
10 (Figure C.16).

11 **C.5.3 Prevention of Overtopping**

12 Overtopping prevention is accomplished through administrative controls and liquid-level instrumentation
13 installed in each basin. The instrumentation includes local liquid-level indication as well as remote
14 indication at the ETF. Before an aqueous waste is transferred into a basin, administrative controls are
15 implemented to ensure overtopping will not occur during the transfer. The volume of feed to be
16 transferred is compared to the available volume in the receiving basin. The transfer is not initiated unless
17 there is sufficient volume available in the receiving basin or a cut-off level is established. The transfer
18 into the basin would be stopped when this cut-off level is reached.

19 In the event of a ~~100~~25-year, 24-hour storm event, precipitation would accumulate on the basin covers.
20 Through the self-tensioning design of the basin covers and maintenance of adequate freeboard, all
21 accumulated precipitation would be contained on the covers and none would flow over the dikes or
22 anchor walls. The ~~100~~25-year, 24-hour storm is expected to deliver 5.3 centimeters of rain or
23 approximately 61 centimeters of snow. Cover specifications include the requirement that the covers be
24 able to withstand the load from this amount of precipitation. Because the cover floats on the surface of
25 the fluid in the basin, the fluid itself provides the primary support for the weight of the accumulated
26 precipitation. Through the cover self-tensioning mechanism, there is ample 'give' to accommodate the
27 overlying load without overstressing the anchor and attachment points.

28 Rainwater and snow evaporate readily from the cover, particularly in the arid Hanford Facility climate,
29 where evaporation rates exceed precipitation rates for most months of the year. The black color of the
30 cover further enhances evaporation. Thus, the floating cover prevents the intrusion of precipitation into
31 the basin and provides for evaporation of accumulated rain or snow.

32 **C.5.3.1 Freeboard**

33 Under current operating conditions, 0.61 meter of freeboard is maintained at each LERF basin, which
34 corresponds to an operating level of 6.8 meters, or 29.5 million liters.

35 **C.5.3.2 Immediate Flow Shutoff**

36 The mechanism for transferring aqueous waste is either through pump transfers with on/off switches or
37 through gravity transfers with isolation valves. These methods provide positive ability to shut off
38 transfers immediately in the event of overtopping. Overtopping a basin during a transfer is very unlikely
39 because the low flow rate into the basin provides long response times. At a flow rate of 284 liters per
40 minute, approximately 11 days would be required to fill a LERF basin from the 6.8-meter operating level
41 (i.e., 0.61 meter of freeboard) to maximum capacity of 34 million liters (i.e., the 7.4-meter level).

42 **C.5.3.3 Outflow Destination**

43 Aqueous waste in the LERF is transferred routinely to 200 Area ETF for treatment. However, should it
44 be necessary to immediately empty a basin, the aqueous waste either would be transferred to the 200 Area
45 ETF for treatment or transferred to another basin (or basins), whichever is faster. If necessary a
46 temporary pumping system may be installed to increase the transfer rate.

1 C.5.4 Structural Integrity of Dikes

2 The structural integrity of the dikes was certified attesting to the structural integrity of the dikes, signed
3 by a qualified, registered professional engineer.

4 C.5.4.1 Dike Design, Construction, and Maintenance

5 The dikes of the LERF are constructed of onsite native soils, generally consisting of cobbles and gravels.
6 Well-graded mixtures were specified, with cobbles up to 15 centimeters in the largest dimension, but not
7 constituting more than 20 percent of the volume of the fill. The dikes are designed with a 3:1 (3 units
8 horizontal to 1 unit vertical) slope on the basin side, and 2.25:1 on the exterior side. The dikes are
9 approximately 8.2 meters high from the bottom of the basin, and 3 meters above grade.

10 Calculations were performed to verify the structural integrity of the dikes (HNF 1997). The calculations
11 demonstrate that the structural strength of the dikes is such that, without dependence on any lining
12 system, the sides of the basins can withstand the pressure exerted by the maximum allowable quantity of
13 fluid in the impoundment. The dikes have a factor of safety greater than 2.5 against failure by sliding.

14 C.5.4.2 Dike Stability and Protection

15 In the following paragraphs, various aspects of stability for the LERF dikes and the concrete anchor wall
16 are presented, including slope failure, hydrostatic pressure, and protection from the environment.

17 **Failure in Dike/Impoundment Cut Slopes.** A slope stability analysis was performed to determine the
18 factor of safety against slope failure. The computer program 'PCSTABL5' from Purdue University, using
19 the modified Janbu Method, was employed to evaluate slope stability under both static and seismic
20 loading cases. One hundred surfaces per run were generated and analyzed. The assumptions used were
21 as follows (Chen-Northern 1991b):

- 22 • Weight of gravel: 2,160 kilograms per cubic meter
- 23 • Maximum dry density of gravel: 2,315 kilograms per cubic meter
- 24 • Mohr-Coulomb shear strength angle for gravel: minimum 33 degrees
- 25 • Weight of soil/bentonite: 1,600 kilograms per cubic meter
- 26 • Mohr-Coulomb shear strength angle for soil/bentonite: minimum 30 degrees
- 27 • Slope: 3 horizontal: 1 vertical
- 28 • No fluid in impoundment (worst case for stability)
- 29 • Soils at in-place moisture (not saturated conditions)

30 Results of the static stability analysis showed that the dike slopes were stable with a minimum factor of
31 safety of 1.77 (Chen-Northern 1991b).

32 The standard horizontal acceleration required in the *Hanford Plant Standards*, "Standard Architectural-
33 Civil Design Criteria, Design Loads for Facilities" (DOE-RL 1988), for structures on the Hanford Site is
34 0.12 g. Adequate factors of safety for cut slopes in units of this type generally are considered 1.5 for
35 static conditions and 1.1 for dynamic stability (Golder 1989). Results of the stability analysis showed that
36 the LERF basin slopes were stable under horizontal accelerations of 0.10 and 0.15 g, with minimum
37 factors of safety of 1.32 and 1.17, respectively (Chen-Northern 1991b). Printouts from the PCSTABL5
38 program are provided in *Calculations for Liquid Effluent Retention Facility Part B Permit Application*
39 (HNF 1997).

40 **Hydrostatic Pressure.** Failure of the dikes due to buildup of hydrostatic pressure, caused by failure of
41 the leachate system or liners, is very unlikely. The liner system is constructed with two essentially
42 impermeable layers consisting of a synthetic layer overlying a soil layer with low-hydraulic conductivity.
43 It would require a catastrophic failure of both liners to cause hydrostatic pressures that could endanger
44 dike integrity. Routine inspections of the leachate detection system, indicating quantities of leachate
45 removed from the basins, provide an early warning of leakage or operational problems that could lead to
46 excessive hydrostatic pressure. A significant precipitation event (e.g., a ~~100~~25-year, 24-hour storm) will
47 not create a hydrostatic problem because the interior sidewalls of the basins are covered completely by the

1 liners. The covers can accommodate this volume of precipitation without overtopping the dike
2 (Section C.5.3), and the coarse nature of the dike and foundation materials on the exterior walls provides
3 for rapid drainage of precipitation away from the basins.

4 **Protection from Root Systems.** Risk to structural integrity of the dikes because of penetrating root
5 systems is minimal. Excavation and construction removed all vegetation on and around the
6 impoundments, and native plants (such as sagebrush) grow very slowly. The large grain size of the
7 cobbles and gravel used as dike construction material do not provide an advantageous germination
8 medium for native plants. Should plants with extending roots become apparent on the dike walls, the
9 plants will be controlled with appropriate herbicide application.

10 **Protection from Burrowing Mammals.** The cobble size materials that make up the dike construction
11 material and the exposed nature of the dike sidewalls do not offer an advantageous habitat for burrowing
12 mammals. Lack of vegetation on the LERF site discourages foraging. The risk to structural integrity of
13 the dikes from burrowing mammals is therefore minimal. Periodic visual inspections of the dikes provide
14 observations of any animals present. Should burrowing mammals be noted onsite, appropriate pest
15 control methods such as trapping or application of rodenticides will be employed.

16 **Protective Cover.** Approximately 7.6 centimeters of crushed gravel serve as the cover of the exterior
17 dike walls. This coarse material is inherently resistant to the effect of wind because of its large grain size.
18 Total annual precipitation is low (16 centimeters) and a significant storm event (e.g., a ~~100~~25-year,
19 24-hour storm) could result in about 5.3 centimeters of precipitation in a 24-hour period. The absorbent
20 capacity of the soil exceeds this precipitation rate; therefore, the impact of wind and precipitation run-on
21 to the exterior dike walls will be minimal.

22 **C.5.5 Piping Systems**

23 Aqueous waste from the 242-A Evaporator is transferred to the LERF using a pump located in the
24 242-A Evaporator and approximately 1,500 meters of pipe, consisting of a 3-inch carrier pipe within a
25 6-inch outer containment pipeline. Flow through the pump is controlled through a valve at flow rates
26 from 150 to 300 liters per minute. The pipeline exits the 242-A Evaporator below grade and remains
27 below grade at a minimum 1.2 meter depth for freeze protection, until the pipeline emerges at the LERF
28 catch basin, at the corner of each basin. All piping at the catch basin that is less than 1.2 meters below
29 grade is wrapped with electric heat tracing tape and insulated for protection from freezing.

30 The transfer line from the 242-A Evaporator is centrifugally cast, fiberglass-reinforced epoxy thermoset
31 resin pressure pipe fabricated to meet the requirements of ASME D2997 (ASME 1984). The 3-inch
32 carrier piping is centered and supported within 6-inch containment piping. Pipe supports are fabricated of
33 the same material as the pipe, and meet the strength requirements of ANSI B31.3 (ANSI 1987) for dead
34 weight, thermal, and seismic loads. A catch basin is provided at the northwest corner of each basin where
35 piping extends from the basin to allow for basin-to-basin and basin-to-200 Area ETF liquid transfers.
36 Drawing H-2-88766, Sheets 1 through 4, provide schematic diagrams of the piping system at LERF.
37 Drawing H-2-79604 provides details of the piping from the 242-A Evaporator to LERF.

38 **C.5.5.1 Secondary Containment System for Piping**

39 The 6-inch containment piping encases the 3-inch carrier pipe from the 242-A Evaporator to the LERF.
40 All of the piping and fittings that are not directly over a catch basin or a basin liner are of this pipe-
41 within-a-pipe construction. A catch basin is provided at the northwest corner of each basin where the
42 inlet pipes, leachate risers, and transfer pipe risers emerge from the basin. The catch basin consists of a
43 20-centimeter-thick concrete pad at the top of the dike. The perimeter of the catch basin has a
44 20-centimeter-high curb, and the concrete is coated with a chemical resistant epoxy sealant. The concrete
45 pad is sloped so that any leaks or spills from the piping or pipe connections will drain into the basin. The
46 catch basin provides an access point for inspecting, servicing, and operating various systems such as
47 transfer valving, leachate level instrumentation and leachate pump. Drawing H-2-79593 provides a
48 schematic diagram of the catch basins.

1 **C.5.5.2 Leak Detection System**

2 Single-point electronic leak detection elements are installed along the transfer line at 305-meter intervals.
3 The leak detection elements are located in the bottom of specially designed test risers. Each sensor
4 element employs a conductivity sensor, which is connected to a cable leading back to the 242-A
5 Evaporator control room. If a leak develops in the carrier pipe, fluid will travel down the exterior surface
6 of the carrier pipe or the interior of the containment pipe. As moisture contacts a sensor unit, a general
7 alarm sounds in the 242-A Evaporator and 200 Area ETF control rooms and the zone of the Sensor unit
8 causing the general alarm can be determined using the 242-
9 A Evaporator leak detection monitoring panel. Upon verification of a leak, the pump located in the 242-
10 A Evaporator is shut down, stopping the flow of aqueous waste through the transfer line. A low-volume
11 air purge of the annulus between the carrier pipe and the containment pipe is provided to prevent
12 condensation buildup and minimize false alarms by the leak detection elements.

13 The catch basins have conductivity leak detectors that alarm in the 242-A Evaporator and 200 Area ETF
14 control rooms. Leaks into the catch basins drain back to the basin through a 5.1-centimeter drain on the
15 floor of the catch basin.

16 **C.5.5.3 Certification**

17 Although an integrity assessment is not required for piping associated with surface impoundments, an
18 assessment of the transfer liner was performed, including a hydrostatic leak/pressure test at
19 10.5 kilograms per square centimeter gauge. A statement by an independent, qualified, registered
20 professional engineer attesting to the integrity of the piping system is included in *Integrity Assessment*
21 *Report for the 242-A Evaporator/LERF Waste Transfer Piping, Project W105* (WHC 1993), along with
22 the results of the leak/pressure test.

23 **C.5.6 Double Liner and Leak Detection, Collection, and Removal System**

24 The double-liner system for LERF is discussed in Section C.5.2. The leachate detection, collection, and
25 removal system (Figure C.18 and Figure C.19) was designed and constructed to remove leachate that
26 might permeate the primary liner. System components for each basin include:

- 27 • 30.5-centimeter layer of drainage gravel below the primary liner at the bottom of the basin
- 28 • Geonet below the primary liner on the sidewalls to direct leachate to the gravel layer
- 29 • 3.0-meter by 1.8-meter by 0.30-meter-deep leachate collection sump consisting of a 25 millimeter
30 high-density polyethylene flat stock, geotextile to trap large particles in the leachate, and
31 1.5-millimeter high-density polyethylene rub sheet set on the secondary liner
- 32 • 10-inch and 4-inch perforated leachate high-density polyethylene riser pipes from the leachate
33 collection sump to the catch basin northwest of the basin
- 34 • Leachate collection sump level instrumentation installed in the 4-inch riser
- 35 • Level sensors, submersible leachate pump, and 1.5-inch fiberglass-reinforced epoxy thermoset resin
36 pressure piping installed in the 10-inch riser
- 37 • Piping at the catch basin to route the leachate through 1.5-inch high-density polyethylene pipe back to
38 the basins

39 The bottom of the basins has a two percent slope to allow gravity flow of leachate to the leachate
40 collection sump. This exceeds the minimum of 1 percent slope required by [WAC 173-303-650\(j\)](#) for new
41 surface impoundments. Material specifications for the leachate collection system are given in
42 Section C.5.2.1.1.

43 Calculations demonstrate that fluid from a small hole (2 millimeter) (EPA 1989, p. 122) at the furthest
44 end of the basin, under a low head situation, would travel to the sump in less than 24 hours (HNF 1997).

1 Additional calculations indicate the capacity of the pump to remove leachate is sufficient to allow time to
2 readily identify a leak and activate emergency procedures (HNF 1997).

3 Automated controls maintain the fluid level in each leachate sump below 33 centimeters to prevent
4 significant liquid backup into the drainage layer. The leachate pump is activated when the liquid level in
5 the sump reaches about 28 centimeters, and is shut off when the sump liquid level reaches about
6 18 centimeters. This operation prevents the leachate pump from cycling with no fluid, which could
7 damage the pump. Liquid level control is accomplished with conductivity probes that trigger relays
8 selected specifically for application to submersible pumps and leachate fluids. A flow meter/totalizer on
9 the leachate return pipe measures fluid volumes pumped and pumping rate from the leachate collection
10 sumps, and indicates volume and flow rate on local readouts. Other instrumentation provided is real-time
11 continuous level monitoring with readout at the catch basin and the 242-A Evaporator control room. A
12 sampling port is provided in the leachate piping system at the catch basin. Leak detection is provided
13 through inspections of the leachate flow totalizer readings. For more information on inspections, refer to
14 Addendum I.

15 The stainless steel leachate pump is designed to deliver 110 liters per minute. The leachate pump returns
16 draw liquid from the sump via 1.5-inch pipe and discharges into the basin through 1.5-inch high-density
17 polyethylene pipe.

18 **C.5.7 Construction Quality Assurance**

19 The construction quality assurance plan and complete report of construction quality assurance inspection
20 and testing results are provided in *242-A Evaporator Interim Retention Basin Construction Quality*
21 *Assurance Plan* (KEH 1991). A general description of construction quality assurance procedures is
22 outlined in the following paragraphs.

23 For excavation of the basins and construction of the dikes, regular inspections were conducted to ensure
24 compliance with procedures and drawings, and compaction tests were performed on the dike soils.

25 For the soil/bentonite layer, test fills were first conducted in accordance with EPA guidance to
26 demonstrate compaction procedures and to confirm compaction and permeability requirements can be
27 met. The ratio of bentonite to soil and moisture content was monitored; lifts did not exceed
28 15 centimeters before compaction, and specific compaction procedures were followed. Laboratory and
29 field tests of soil properties were performed for each lift and for the completed test fill. The same suite of
30 tests was conducted for each lift during the laying of the soil/bentonite admixture in the basins.

31 Geotextiles and geomembranes were laid in accordance with detailed procedures and quality assurance
32 programs provided by the manufacturers and installers. These included destructive and nondestructive
33 tests on the geomembrane seams, and documentation of field test results and repairs.

34 **C.5.8 Proposed Action Leakage Rate and Response Action Plan**

35 An action leakage rate limit is established where action must be taken due to excessive leakage from the
36 primary liner. The action leak rate is based on the maximum design flow rate the leak detection system
37 can remove without the fluid head on the bottom liner exceeding 30 centimeters. The limiting factor in
38 the leachate removal rate is the hydraulic conductivity of the drainage gravel. An action leakage rate
39 (also called the rapid or large leak rate) of 20,000 liters per hectare per day was calculated for each basin
40 (WHC 1992b).

41 When it is determined that the action leakage rate has been exceeded, the response action plan will follow
42 the actions in [WAC 173-303-650](#)(11)(b) and (c), which includes notification of Ecology in writing
43 within 7 days, assessing possible causes of the leak, and determining whether waste receipt should be
44 curtailed and/or the basin emptied.

45 **C.5.9 Dike Structural Integrity Engineering Certification**

46 The structural integrity of the dikes was certified attesting to the structural integrity of the dikes, signed
47 by a qualified, registered professional engineer.

C.5.10 Management of Ignitable, Reactive, or Incompatible Wastes

Although ignitable or reactive aqueous waste might be received in small quantities at LERF, such aqueous waste is mixed with dilute solutions in the basins, removing the ignitable or reactive characteristics. For compatibility requirements with the LERF liner, refer to Addendum B, Waste Analysis Plan.

C.6 AIR EMISSIONS CONTROL

This section addresses the 200 Area ETF requirements of Air Emission Standards for Process Vents, under [40 CFR 264](#), Subpart AA ([WAC 173-303-690](#) incorporated by reference) and Subpart CC. The requirements of [40 CFR 264](#), Subpart BB ([WAC 173-303-691](#)) is not applicable because aqueous waste with 10 percent or greater organic concentration would not be acceptable for processing at the ETF.

C.6.1 Applicability of Subpart AA Standards

The 200 Area ETF evaporator and thin film dryer perform operations that specifically require evaluation for applicability of [WAC 173-303-690](#). Aqueous waste in these units routinely contains greater than 10 parts per million concentrations of organic compounds and are, therefore, subject to air emission requirements under [WAC 173-303-690](#). Organic emissions from all affected process vents on the Hanford Facility must be less than 1.4 kilograms per hour and 2.8 mega grams per year, or control devices must be installed to reduce organic emissions by 95 percent.

The vessel off gas system provides a process vent system. This system provides a slight vacuum on the 200 Area ETF process vessels and tanks (refer to Section C.2.5.2). Two vessel vent header pipes combine and enter the vessel off gas system filter unit consisting of a demister, electric heater, prefilter, high-efficiency particulate air filters, activated carbon absorber, and two exhaust fans (one fan in service while the other is backup). The vessel off gas system filter unit is located in the high-efficiency particulate air filter room west of the process area. The vessel off gas system exhaust discharges into the larger building ventilation system, with the exhaust fans and stack located outside and immediately west of the ETF. The exhaust stack discharge point is 15.5 meters above ground level.

The annual average flow rate for the 200 Area ETF stack (which is the combined vessel off gas and building exhaust flow rates) is 1600 cubic meters per minute with a total annual flow of approximately 8.4 E+08 cubic meters. During waste processing, the airflow through just the vessel off gas system is about 23 standard cubic meters per minute.

Organic emissions occur during waste processing, which occurs less than 310 days each year (i.e., 85 percent operating efficiency). This operating efficiency represents the maximum annual operating time for the ETF, as shutdowns are required during the year for planned maintenance outages and for reconfiguring the 200 Area ETF to accommodate different aqueous waste.

C.6.2 Process Vents - Demonstrating Compliance

This section outlines how the 200 Area ETF complies with the requirements and includes a discussion of the basis for meeting the organic emissions limits, calculations demonstrating compliance, and conditions for reevaluation.

C.6.2.1 Basis for Meeting Limits/Reductions

The 242-A Evaporator and the 200 Area ETF are currently the only operating TSD units that contribute to the Hanford Facility volatile organic emissions under [40 CFR 264](#), Subpart AA. The combined release rate is currently well below the threshold of 1.4 kilograms per hour or 2,800 kilograms per year of volatile organic compounds. As a result, the 200 Area ETF meets these standards without the use of air pollution control devices.

The amount of organic emissions could change as waste streams are changed, or TSD units are brought online or are deactivated. The organic air emissions summation will be re-evaluated periodically as condition warrants. Operations of the TSD units operating under [40 CFR 264](#), Subpart AA, will be

1 controlled to maintain Hanford Facility emissions below the threshold limits or pollution control device(s)
2 will be added, as necessary, to achieve the reduction standards specified under [40 CFR 264](#), Subpart AA.

3 **C.6.2.2 Demonstrating Compliance**

4 Calculations to determine organic emissions are performed using the following assumptions:

- 5 • Maximum flow rate from LERF to 200 Area ETF is 568 liters per minute.
- 6 • Emissions of organics from tanks and vessels upstream of the UV/OX process are determined from
7 flow and transfer rates given in *Clean Air Act Requirements, WAC 173-400, As-built Documentation,*
8 *Project C-018H, 242-A Evaporator/PUREX Plant Process Condensate Treatment Facility*
9 *(Adtechs 1995).*
- 10 • UV/OX reaction rate constants and residence times are used to determine the amount of organics,
11 which are destroyed in the UV/OX process. These constants are given in *200 Area Effluent*
12 *Treatment Facility Delisting Petition* (DOE/RL 1992).
- 13 • All organic compounds that are not destroyed in the UV/OX process are assumed to be emitted from
14 the tanks and vessels into the vessel off gas system.
- 15 • No credit for removal of organic compounds in the vessel off gas system carbon absorber unit is
16 taken. The activated carbon absorbers are used if required to reduce organic emissions.

17 The calculation to determine organic emissions consists of the following steps:

- 18 1. Determine the quantity of organics emitted from the tanks or vessels upstream of the UV/OX process,
19 using transfer rate values
- 20 2. Determine the concentration of organics in the waste after the UV/OX process using UV/OX reaction
21 rates and residence times. If the 200 Area ETF is configured such that the UV/OX process is not
22 used, a residence time of zero is used in the calculations (i.e., none of the organics are destroyed)
- 23 3. Assuming all the remaining organics are emitted, determine the rate which the organics are emitted
24 using the feed flow rate and the concentrations of organics after the UV/OX process
- 25 4. The amount of organics emitted from the vessel off gas system is the sum of the amount
26 calculated in steps 1 and 3.

27 The organic emission rates and quantity of organics emitted during processing are determined using these
28 calculations and are included in the Hanford Facility Operating Record, LERF and 200 Area ETF file.

29 **C.6.2.3 Reevaluating Compliance with Subpart AA Standards**

30 Calculations to determine compliance with Subpart AA will be reviewed when any of the following
31 conditions occur at the 200 Area ETF:

- 32 • Changes in the maximum feed rate to the 200 Area ETF (i.e., greater than the 568 liters per minute
33 flow rate)
- 34 • Changes in the configuration or operation of the 200 Area ETF that would modify the assumptions
35 given in Section C.6.2.2 (e.g., taking credit for the carbon absorbers as a control device)
- 36 • Annual operating time exceeds 310 days.

37 **C.6.3 Applicability of Subpart CC Standards**

38 The air emission standards of [40 CFR 264](#), Subpart CC apply to tank, surface impoundment, and
39 container storage units that manage wastes with average volatile organic concentrations equal to or
40 exceeding 500 parts per million by weight, based on the hazardous waste composition at the point of
41 origination (61 FR 59972). However, TSD units that are used solely for management of mixed waste are
42 exempt. Mixed waste is managed at the LERF and 200 Area ETF and dangerous waste could be treated
43 and stored at these TSD units.

1 TSD owner/operators are not required to determine the concentration of volatile organic compounds in a
2 hazardous waste if the wastes are placed in waste management units that employ air emission controls
3 that comply with the Subpart CC standards. Therefore, the approach to Subpart CC compliance at the
4 LERF and 200 Area ETF is to demonstrate that the LERF and 200 Area ETF meet the Subpart CC control
5 standards ([40 CFR 264.1084](#) – [40 CFR 264.1086](#)).

6 **C.6.3.1 Demonstrating Compliance with Subpart CC for Tanks**

7 Since the 200 Area ETF tanks already have process vents regulated under [40 CFR 264](#), Subpart AA
8 ([WAC 173-303-690](#)), they are exempt from Subpart CC [[40 CFR 264.1080\(b\)\(8\)](#)].

9 **C.6.3.2 Demonstrating Compliance with Subpart CC for Containers**

10 Container Level 1 and Level 2 standards are met at the 200 Area ETF by managing all dangerous and/or
11 mixed wastes in U.S. Department of Transportation containers [[40 CFR 264.1086\(f\)](#)]. Level 1 containers
12 are those that store more than 0.1 cubic meters and less than or equal to 0.46 cubic meters. Level 2
13 containers are used to store more than 0.46 cubic meters of waste, which are in 'light material service'.
14 Light material service is defined where a waste in the container has one or more organic constituents
15 with a vapor pressure greater than 0.3 kilopascals at 20 C, and the total concentration of such
16 constituents is greater than or equal to 20 percent by weight.

17 The monitoring requirements for Level 1 and Level 2 containers include a visual inspection when the
18 container is received at the 200 Area ETF and when the waste is initially placed in the container.
19 Additionally, at least once every 12 months when stored onsite for 1 year or more, these containers must
20 be inspected.

21 If compliant containers are not used at the 200 Area ETF, alternate container management practices are
22 used that comply with the Level 1 standards. Specifically, the Level 1 standards allow for a "container
23 equipped with a cover and closure devices that form a continuous barrier over the container openings such
24 that when the cover and closure devices are secured in the closed position there are no visible holes, gaps,
25 or other open spaces into the interior of the container. The cover may be a separate cover installed on the
26 container...or may be an integral part of the container structural design..." [[40 CFR 264.1086\(c\)\(1\)\(ii\)](#)].
27 An organic-vapor-suppressing barrier, such as foam, may also be used [[40 CFR 264.1086\(c\)\(1\)\(iii\)](#)].
28 Section C.3 provides detail on container management practices at the 200 Area ETF.

29 Container Level 3 standards apply when a container is used for the "treatment of a hazardous waste by a
30 waste stabilization process" [[40 CFR 264.1086\(2\)](#)]. Because treatment in containers using the
31 stabilization process is not provided at the 200 Area ETF, these standards do not apply.

32 **C.6.3.3 Demonstrating Compliance with Subpart CC for Surface Impoundments**

33 The Subpart CC emission standards are met at LERF using a floating membrane cover that is constructed
34 of very-low-density polyethylene that forms a continuous barrier over the entire surface area
35 [[40 CFR 264.1085\(c\)](#)]. This membrane has both organic permeability properties equivalent to a high-
36 density polyethylene cover and chemical/physical properties that maintain the material integrity for the
37 intended service life of the material. The additional requirements for the floating cover at the LERF have
38 been met (Section C.5.2.4).

39 **C.7 ENGINEERING DRAWINGS**

40 **C.7.1 Liquid Effluent Retention Facility**

41 Drawings of the containment systems at the LERF are summarized in Table C.1. Because the failure of
42 these containment systems at LERF could lead to the release of dangerous waste into the environment,
43 modifications that affect these containment systems will be submitted to the Washington State
44 Department of Ecology, as a Class 1, 2, or 3 Permit modification, as required by [WAC 173-303-830](#).

Table C.1. Liquid Effluent Retention Facility Containment System

| LERF System | Drawing Number | Drawing Title |
|--------------|-------------------------|---|
| Bottom Liner | H-2-79590, Sheet 1 | Civil Plan, Sections and Details; Cell Basin Bottom Liner |
| Top Liner | H-2-79591, Sheet 1 | Civil Plan, Sections and Details; Cell Basin Bottom Liner |
| Catch Basin | H-2-79593, Sheet 1, 3-5 | Civil Plan, Section and Details; Catch Basin |

The drawings identified in Table C.2 illustrate the piping and instrumentation configuration within LERF, and of the transfer piping systems between the LERF and the 242-A Evaporator. These drawings are provided for general information and to demonstrate the adequacy of the design of the LERF as a surface impoundment.

Table C.2. Liquid Effluent Retention Facility Piping and Instrumentation

| LERF System | Drawing Number | Drawing Title |
|-------------------------------------|--------------------|---|
| Transfer Piping to 242-A Evaporator | H-2-79604, Sheet 1 | Piping Plot and Key Plans; 242-A Evaporator Condensate Stream |
| LERF Piping and Instrumentation | H-2-88766, Sheet 1 | P&ID; LERF Basin and ETF Influent |
| | H-2-88766, Sheet 2 | P&ID; LERF Basin and ETF Influent |
| | H-2-88766, Sheet 3 | P&ID; LERF Basin and ETF Influent |
| | H-2-88766, Sheet 4 | P&ID; LERF Basin and ETF Influent |
| Legend | H-2-89351, Sheet 1 | Piping & Instrumentation Diagram - Legend |

C.7.2 200 Area Effluent Treatment Facility

Drawings of the secondary containment systems for the 200 Area ETF containers, and tanks and process units, and for the Load-In Tanks are summarized in Table C.3. Because the failure of the secondary containment systems could lead to the release of dangerous waste into the environment, modifications, which affect the secondary containment systems, will be submitted to the Washington State Department of Ecology, as a Class 1, 2, or 3 Permit modification, as required by [WAC 173-303-830](#).

Table C.3. Effluent Treatment Facility and Load-In Station Secondary Containment Systems

| 200 Area ETF Process Unit | Drawing Number | Drawing Title |
|--|---------------------|--|
| Surge Tank, Process/ Container Storage Areas and Trenches - Foundation and Containment | H-2-89063, Sheet 1 | Architectural/structural – Foundation and Grade Beam Plan |
| Sump Tank Containment | H-2-89065, Sheet 1 | Architectural/structural – Foundation, Sections and Detail |
| Verification Tank Foundation and Containment | H-2-89068, Sheet 1 | Architectural/structural – Verification Tank Foundation |
| Load-In Facility Foundation and Containment | H-2-817970, Sheet 1 | Structural – ETF Truck Load-in Facility Plans and Sections |
| Load-In Facility Foundation and Containment | H-2-817970, Sheet 2 | Structural – ETF Truck Load-in Facility Sections and Details |

The drawings identified in Table C.4 provide an illustration of the piping and instrumentation configuration for the major process units and tanks at the ETF, and the Load-In Tanks. Drawings of the transfer piping systems between the LERF and 200 Area ETF, and between the Load-In Station and the 200 Area ETF also are presented in this table. These drawings are provided for general information and to demonstrate the adequacy of the design of the tank systems.

1
2

Table C.4. Major Process Units and Tanks at the Effluent Treatment Facility and Load-In Station

| 200 Area ETF Process Unit | Drawing Number | Drawing Title |
|--|---------------------|--|
| Load-In Facility | H-2-817974, Sheet 1 | P&ID – ETF Truck Load-In Facility |
| Load-In Facility | H-2-817974, Sheet 2 | P&ID – ETF Truck Load-In Facility |
| Surge Tank | H-2-89337, Sheet 1 | P&ID – Surge Tank System |
| UV/Oxidation | H-2-88976, Sheet 1 | P&ID – UV Oxidizer Part 1 |
| UV/Oxidation | H-2-89342, Sheet 1 | P&ID – UV Oxidizer Part 2 |
| Reverse Osmosis | H-2-88980, Sheet 1 | P&ID – 1st RO Stage |
| Reverse Osmosis | H-2-88982, Sheet 1 | P&ID – 2nd RO Stage |
| IX/Polishers | H-2-88983, Sheet 1 | P&ID – Polisher |
| Verification Tanks | H-2-88985, Sheet 1 | P&ID – Verification Tank System |
| ETF Evaporator | H-2-89335, Sheet 1 | P&ID – Evaporator |
| Thin Film Dryer | H-2-88989, Sheet 1 | P&ID – Thin Film Dryer |
| Transfer Piping from LERF to ETF | H-2-88768, Sheet 1 | Piping Plan/Profile 4"– 60M-002-M17 and 3"–60M-001-M17 |
| Transfer Piping from Load-In Facility to ETF | H-2-817969, Sheet 1 | Civil – ETF Truck Load-In Facility Site Plan |

3

1 **Table C.5. 200 Area Effluent Treatment Facility Tank Systems Information**

| Tank Description | Material of Construction | Maximum Tank Capacity ¹ liters | Inner diameter meters | Height meters | Shell Thickness ² centimeters | Corrosion Protection ³ |
|--------------------------------------|--------------------------------|---|--------------------------------|---------------|--|-----------------------------------|
| Load-in tanks 59A-TK-109/-117 (2) | 304 SS | 34,200,350 | 3.6 | 4.7 | 0.64 | Type 304 SS |
| Load-in tank 59A-TK-1 | FRP | 26,000 | 3.0 | 3.8 | 0.48 (dome) 0.63 (walls & bottom) | FRP |
| Surge tank | 304 SS | 465,200 | 7.9 | 9.2 | 0.48 | Type 304 SS |
| pH adjustment tank | 304 SS | 16,700 | 3.0 | 2.5 | 0.64 | Type 304 SS |
| First RO feed tank | 304 SS | 20,600 | 3.0 | 3.2 | 0.64 | Type 304 SS |
| Second RO feed tank | 304 SS | 9,000 | Nonround tank 3.0 m x 1.5 m | 1.5 | 0.48 w/rib stiffeners | Type 304 SS |
| Effluent pH adjustment tank | 304 SS | 14,400 | 2.4 | 3.6 | 0.64 | Type 304 SS |
| Verification tanks (3) | Carbon steel with epoxy lining | 2,940,000,3,000,000 | 18.3 | 11.4 | 0.79 | epoxy coating |
| Secondary waste receiving tanks (2) | 304 SS | 73,800 | 4.3 | 5.7 | 0.64 | Type 304 SS |
| Concentrate tanks (2) | 316L SS | 24,290 | 3.0 | 3.8 | 0.64 | Type 316 SS |
| ETF evaporator (Vapor Body) | Alloy 625 | 20,000 | 2.4 | 6.8 | variable | Alloy 625 |
| Distillate flash tank | 304 SS | 9540 | Horizontal tank 0.76 | Length 2.2 | 0.7 | 304 SS |
| Sump tank 1 | 304 SS | 4,400,900 | 1.5 x 1.5 | 3.4 | 0.48 | 304 SS |
| Sump tank 2 | 304 SS | 4,400,700 | 1.5 x 1.5 | 3.4 | 0.48 | 304 SS |

2 ¹The maximum operating volume of the tanks is identified.
3 ²The nominal thickness of ETF tanks is represented.
4 ³Type 304 SS, 304L, 316 SS and alloy 625 provide corrosion protection.
5 304 SS = stainless steel type 304 or 304L.
6 316L SS = stainless steel type 316L
7 FRP = Fiberglass-reinforced plastic.
8

1 **Table C.6. 200 Area Effluent Treatment Facility Additional Tank System Information**

| Tank Description | Liner Materials | Pressure Controls | Foundation Materials | Structural Support | Seams | Connections |
|--------------------------------------|-----------------|--|---|---------------------------------------|--------|-------------|
| Load-in tanks 59A-TK-109/-117 (2) | None | vent to atmosphere | concrete slab | SS skirt bolted to concrete | welded | flanged |
| Load-in tank 59A-TK-1 | None | vent to atmosphere | concrete slab | bolted to concrete | none | flanged |
| Surge tank | None | vacuum breaker valve/vent to VOG | reinforced concrete ring plus concrete slab | structural steel on concrete base | welded | flanged |
| pH adjustment tank | None | vent to VOG | concrete slab | carbon steel skirt | welded | flanged |
| First RO feed tank | None | vent to VOG | concrete slab | carbon steel skirt | welded | flanged |
| Second RO feed tank | None | vent to VOG | concrete slab | carbon steel frame | welded | flanged |
| Effluent pH adjustment tank | None | vent to VOG | concrete slab | carbon steel skirt | welded | flanged |
| Verification tanks (3) | Epoxy | filtered vent to atmosphere | reinforced concrete ring plus concrete slab | structural steel on concrete base | welded | flanged |
| Secondary waste receiving tanks (2) | None | vent to VOG | concrete slab | carbon steel skirt | welded | flanged |
| Concentrate tanks (2) | None | vent to VOG | concrete slab | carbon steel skirt | welded | flanged |
| ETF evaporator (vapor body) | None | pressure indicator/pressure relief valve vapor vent to DFT/VOG | concrete slab | carbon steel frame | welded | flanged |
| Distillate flash tank | None | Pressure relief valve/vent to vent gas cooler/VOG | concrete slab | carbon steel I-beam and cradle | welded | flanged |
| Sump tank 1 | None | vent to VOG | concrete containment | reinforced concrete containment basin | welded | flanged |
| Sump tank 2 | None | vent to VOG | concrete containment | reinforced concrete containment basin | welded | flanged |

- 2 DFT = distillate flash tank
- 3 VOG = vessel off gas system
- 4

1

Table C.7. Ancillary Equipment and Material Data

| System | Ancillary Equipment | Number | Material |
|---------------------------------|------------------------------------|--------------------------------------|--|
| Load-in tanks | Load-in/transfer pumps (2) | 2025ED-P-103A/-103B | 316 SS |
| | | 2025ED-P-001A/-001B | Cast iron |
| | Load-in filters (6) | 59A-FL-001/-002/-003/ -004/-005/-006 | 304 SS |
| Surge tank | Surge tank pumps (3) | 2025E-60A-P-1A/-1B/-1C | 304 SS |
| Rough filter | Rough filter | 2025E-60B-FL-1 | 304 SS |
| UV/OX | UV oxidation inlet cooler | 2025E-60B-E-1 | 316 SS |
| | UV oxidizers (4) | 2025E-60D-UV-1A/-1B/-2A/-2B | 316 SS |
| pH adjustment | pH adjustment pumps (2) | 2025E-60C-P-1A/-1B | 304 SS |
| Peroxide decomposer | H2O2 decomposers (2) | 2025E-60D-CO-1A/-1B | CS with epoxy coating |
| Fine filter | Fine filter | 2025E-60B-FL-2 | 304 SS |
| Degasification | Degasification column inlet cooler | 2025E-60E-E-1 | 316 SS |
| | Degasification column | 2025E-60E-CO-1 | FRP |
| | Degasification pumps (2) | 2025E-60E-P-1A/-1B | 316 SS |
| RO | Feed/booster pumps (6) | 2025E-60F-P-1A/-1B/-2A/-2B/-3A/-3B | 304 SS |
| | Reverse osmosis arrays (21) | 2025E-60F-RO-01 through -21 | Membranes: polyamide Outer piping: 304 SS |
| IX/Polishers | Polishers (3) | 2025E-60G-IX-1A/-1B-1C | CS with epoxy coating |
| | Resins strainers (3) | 2025E-60G-S-1A/-1B/-1C | 304 SS |
| Effluent pH adjustment | Recirculation/transfer pumps (2) | 2025E-60C-P-2A/-2B | 304 SS/PVC |
| Verification tanks | Return pump | 2025E-60H-P-1 | 304 SS |
| | Transfer pumps (2) | 2025E-60H-P-2A/-2B | |
| Secondary waste receiving tanks | Secondary waste feed pumps (2) | 2025E-60I-P-1A/-1B | 304 SS |
| ETF evaporator system | Feed/distillate heat exchanger | 2025E-60I-E-02 | Tubes: 316 SS Shell: 304 SS |
| | Heater (reboiler) | 2025E-60I-E-01 | Tubes: alloy 625 Shell: 304 SS |
| | Recirculation pump | 2025E-60I-P-02 | 316 SS |
| | Concentrate transfer pump | 2025E-60I-P-04 | 316 SS |
| | Entrainment separator | 2025E-60I-DE-01 | Top section: 316 SS Bottom section: alloy 625 |
| | Vapor compressor (incl. silencers) | 2025E-60I-C-01 | 304 SS |
| | Silencer drain pump | 2025E-60I-P-06 | 316 SS |
| | Level control tank | 2025E-60I-TK-5 | 304 SS |
| | Distillate flash tank pump | 2025E-60I-P-03 | 316 SS |
| | Concentrate tanks | Concentrate circulation pumps (2) | 2025E-60J-P-1A/-1B |
| Thin film dryer | Concentrate feed pump | 2025E-60J-P-2 | 316 SS |
| | Thin film dryer | 2025E-60J-D-1 | Interior surfaces: alloy 625 Rotor and blades: 316 SS |
| | Powder hopper | 2025E-60J-H-1 | 316 SS |
| | Spray condenser | 2025E-60J-DE-01 | 316 SS |
| | Distillate condenser | 2025E-60J-CND-01 | Tubes: 304 SS Shell: CS |
| | Dryer distillate pump | 2025E-60J-P-3 | 316 SS |
| | Resin dewatering | Dewatering pump | 2025E-80E-P-1 |

Table C.8. Concrete and Masonry Coatings

| Location | Product Name | Applied Film Thickness, Estimated |
|--|---|-----------------------------------|
| ETF Process and Container Storage Areas | | |
| Floor: Topcoat | Steelcote Floor-Nu Finish ¹ | 2 coats at 10-12 mils |
| Floor: Primer | Steelcote Monomid Hi-Build ¹ | 2.0 mils |
| Walls to 7 feet, Doors & Jambs | Chemproof PermaCoat 4000 Vertical ² | 2 coats at 12-16 mils |
| Load-in Station Tank Pit | | |
| Floor and Walls | Ameron Amercoat 351 ³ | 2 coats at 8.0-12 mils |
| Surge Tank and Verification Tank Berms | | |
| Floors (and Walls at Surge Tank): Topcoat | KCC Corrosion Control Elasti-Liner I ⁴ | 80 mils |
| Floors (and Walls at Surge Tank): Primer | KCC Corrosion Control Techni-Plus E3 ⁴ | 5.0-7.0 mils |

¹Floor-Nu Finish and Monomid Hi-Build are trademarks of Steelcote Manufacturing, Incorporated

²PermaCoat is a trademark of Chemproof Polymers, Incorporated

³Amercoat is a trademark of Ameron International, Incorporated

⁴Elasti-Liner and Techni-Plus are trademarks of KCC Corrosion Control, Incorporated

Table C.9. Geomembrane Material Specifications

| Property | Value |
|--|--|
| Specific gravity | 0.932 to 0.950 |
| Melt flow index | 1.0 g/10 min., maximum |
| Thickness (thickness of flow marks shall not exceed 200% of the nominal liner thickness) | 60 mil 310% (1.5 mm 3 10%) |
| Carbon black content | 1.8 to 3%, bottom liner 2 to 3% top liner |
| Tensile properties (each direction) | |
| Tensile strength at yield | 21.5 kgf/cm width, minimum |
| Tensile strength at break | 32.2 kgf/cm width, minimum |
| Elongation at yield | 10%, minimum |
| Elongation at break | 500%, minimum |
| Tear resistance | 13.6 kgf, minimum |
| Puncture resistance | 31.3 kgf, minimum |
| Low temperature/brittleness | -400 C, maximum |
| Dimensional (%change each direction) | 32%, maximum |
| Environmental stress crack | 750 h, minimum |
| Water absorption | 0.1 maximum and weight change |
| Hydrostatic resistance | 316,000 kgf/m ² |
| Oxidation induction time (200 C/l atm. O ₂) | 90 minutes |

Reference: Construction Specifications (KEH 1990b). Format uses NSF 54 table for high-density polyethylene as a guide (NSF 1985). However, RCRA values for dimensional stability and environmental stress crack have been added.

% = percent
g = gram
min = minute
h = hour

max = maximum
kgf = kilograms force
m = meters
mm = millimeters

1

Table C.10. Drainage Gravel Specifications

| Property | Value |
|-------------------|----------------------|
| Sieve size | |
| 25 millimeters | 100 wt% passing |
| 19 millimeters | 80 – 100 wt% passing |
| 9.5 millimeters | 10 – 40 wt% passing |
| 4.75 millimeters | 0 – 4 wt% passing |
| Permeability | 0.1 cm/sec, minimum |

2

Reference: Sieve size is from WSDOT M41-10-88, Section 9.03.1(3)C for Grading No. 5 (WSDOT 1988).

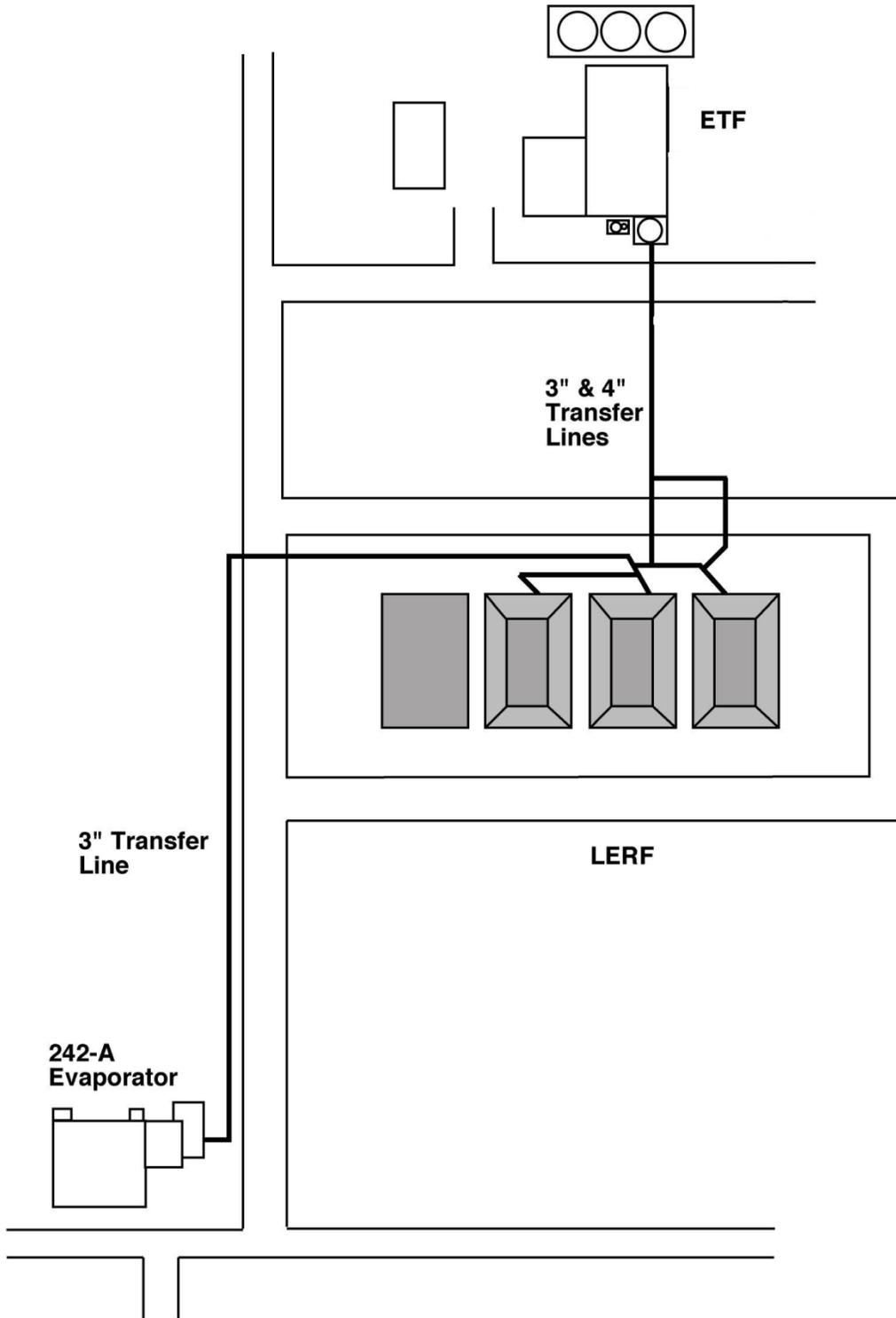
3

Permeability requirement is from [WAC 173-303-650\(2\)\(j\)](#) for new surface impoundments.

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Figure C.1. Liquid Effluent Retention Facility Layout

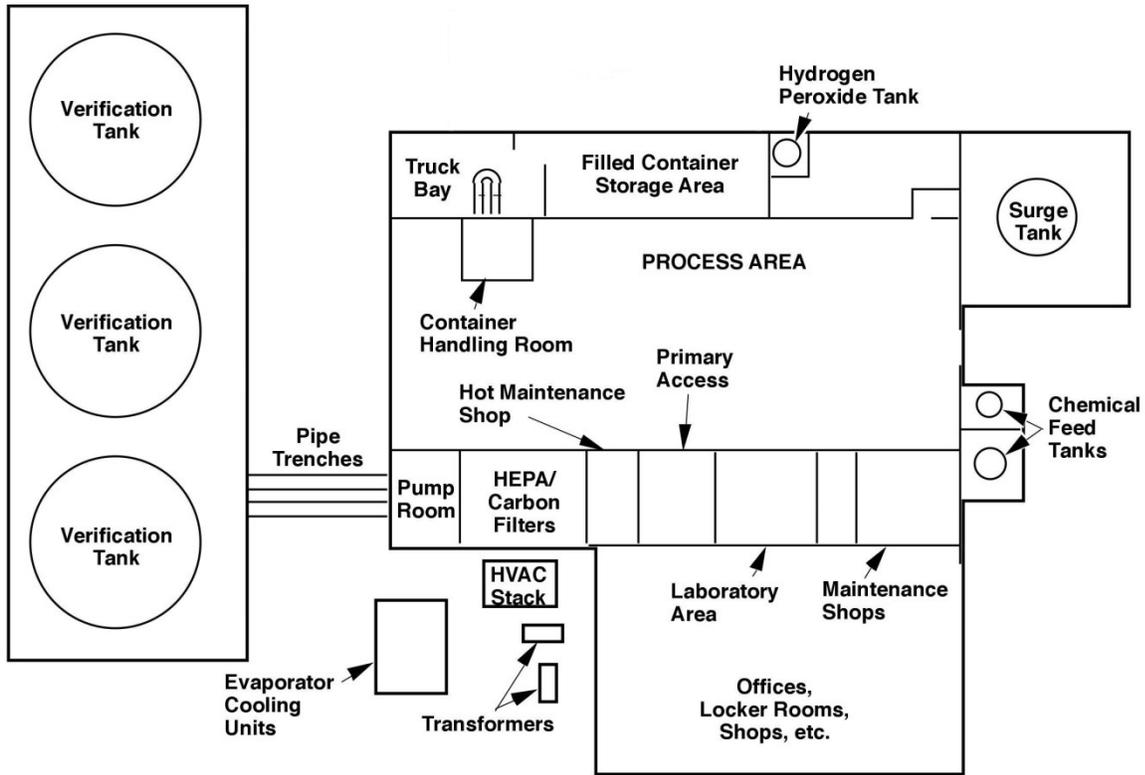


ETF = Effluent Treatment Facility
LERF = Liquid Effluent Retention Facility

M0704-3.5
4-21-07

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Figure C.2. Plan View of the 200 Area Effluent Treatment Facility



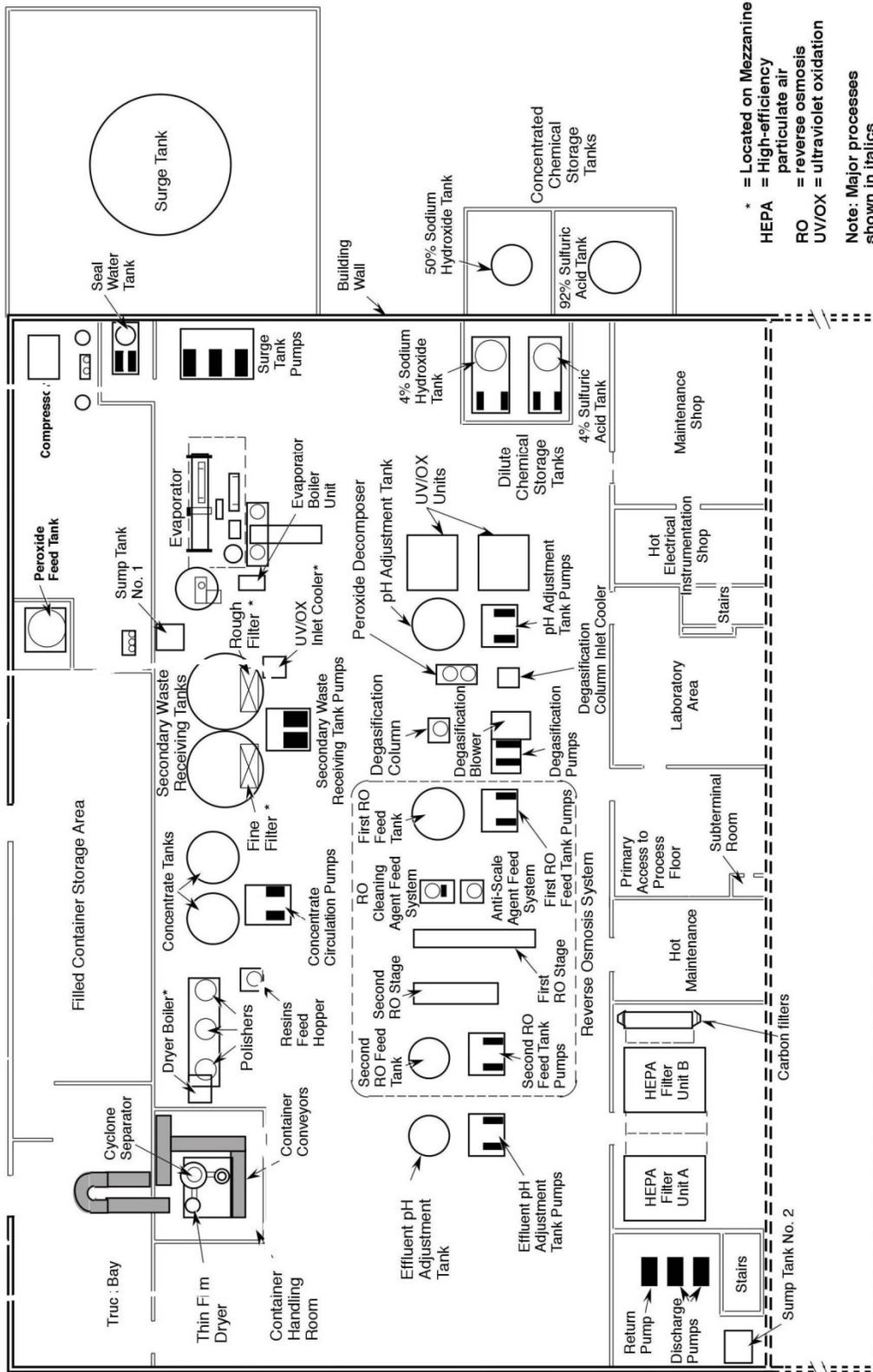
HEPA = High-efficiency particulate air
HVAC = Heating, ventilation, and air conditioning

M0704-3.6
4-24-07

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Figure C.3. 200 Area Effluent Treatment Facility Layout



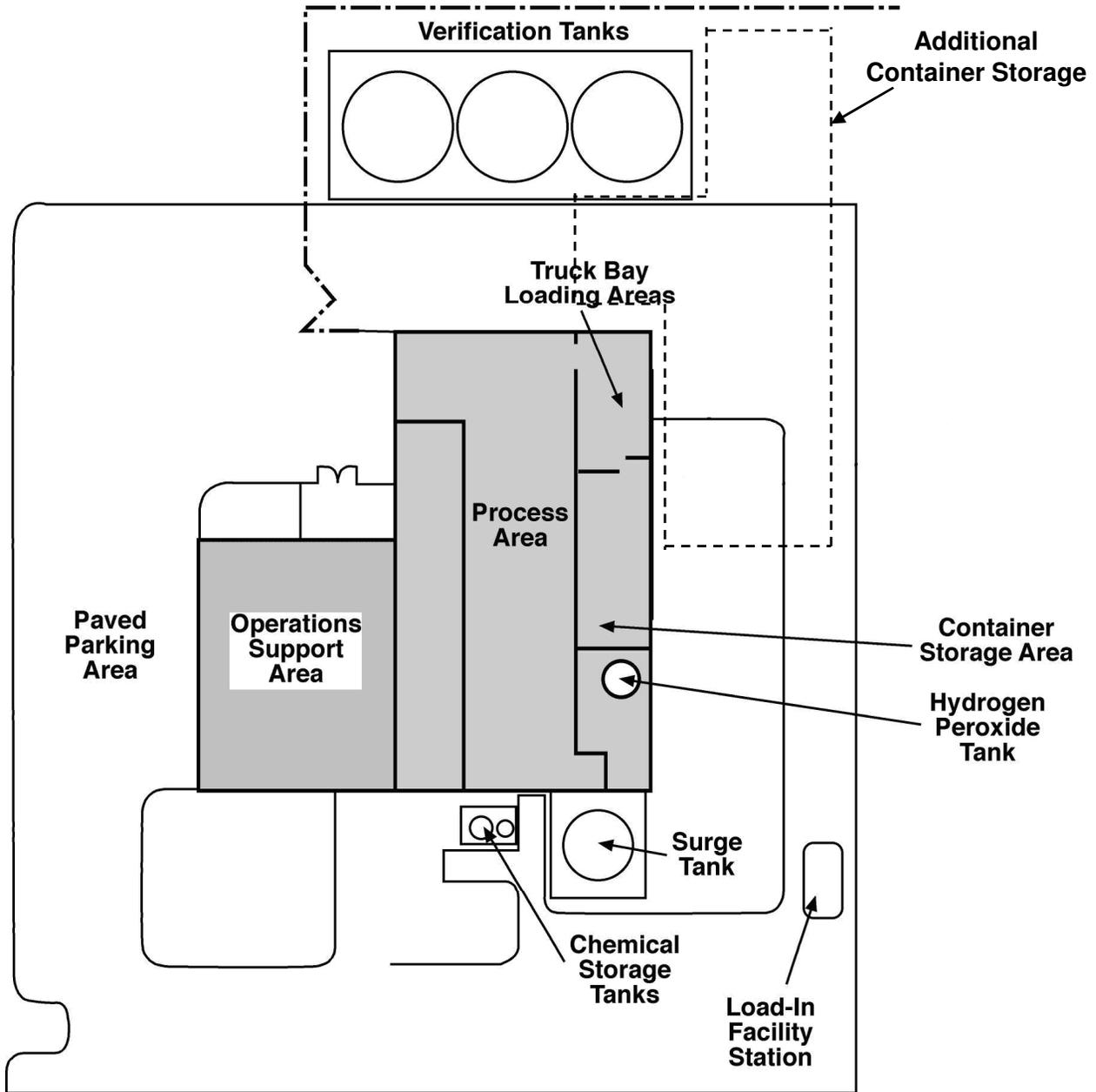
* = Located on Mezzanine
HEPA = High-efficiency particulate air
RO = reverse osmosis
UV/OX = ultraviolet oxidation
Note: Major processes shown in *italics*

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4-21-07

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Figure C.4. 200 Area Effluent Treatment Facility



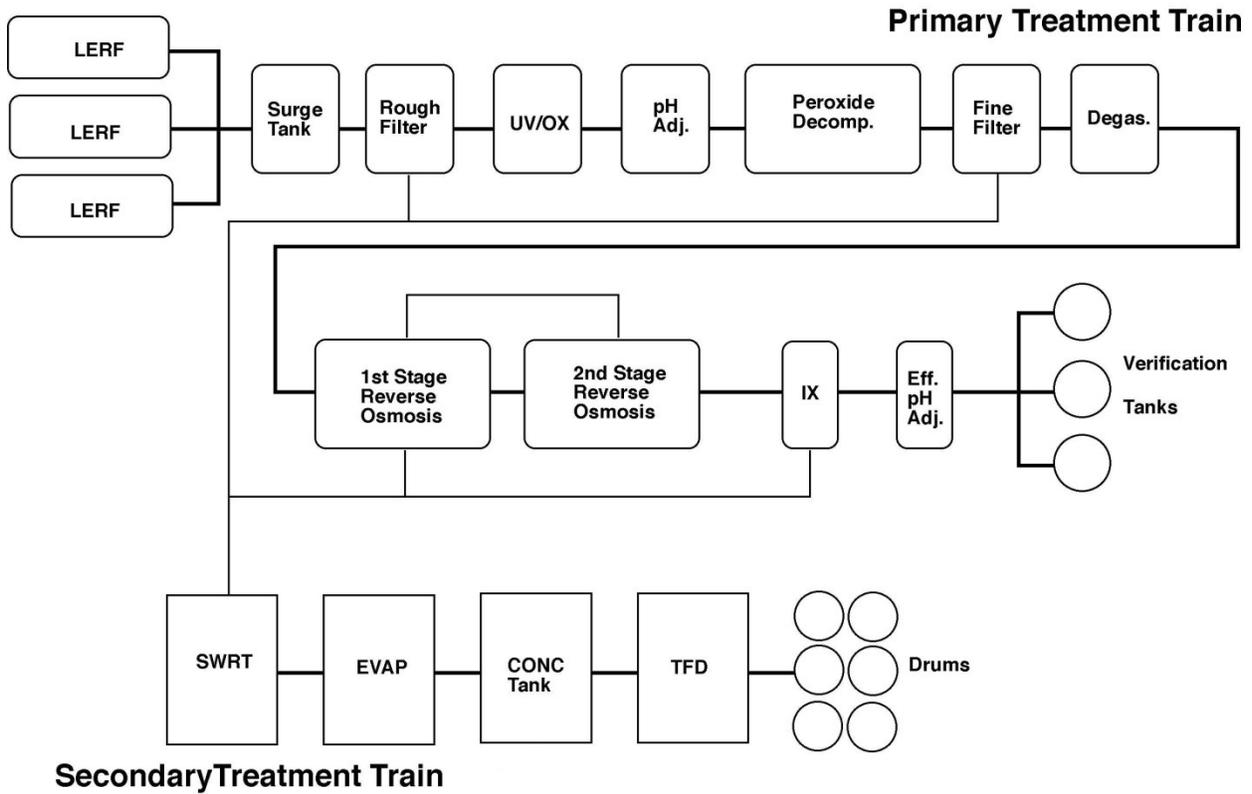
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Figure C.5. Example - 200 Area Effluent Treatment Facility Configuration 1



- CONC Tank = Concentrate tank
- Degas. = Degasification column
- Eff. pH Adj. = Effluent pH adjustment tank
- EVAP = Evaporator
- IX = Ion Exchange
- LERF = Liquid Effluent Retention Facility
- pH Adj. = pH adjustment tank
- SWRT = Secondary waste receiving tank
- TFD = Thin film dryer
- UV/OX = Ultraviolet Oxidation

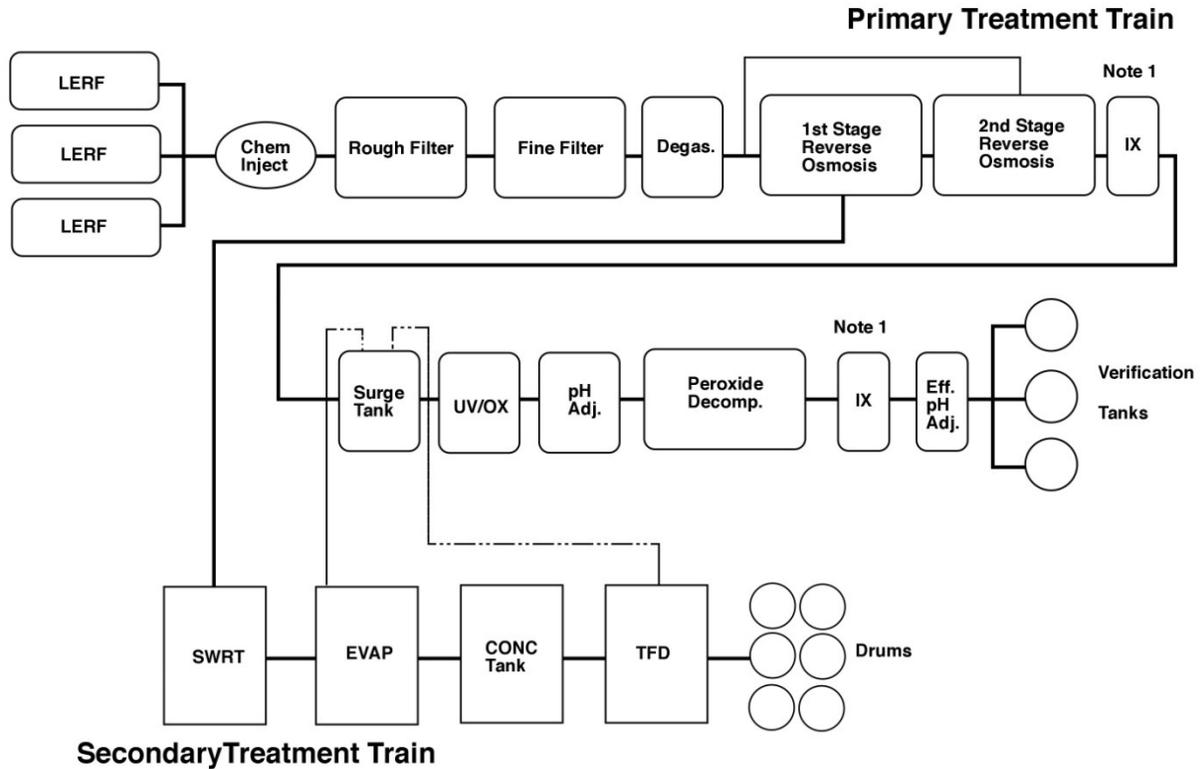
M0704-3.8
4-21-07

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Figure C.6. Example - 200 Area Effluent Treatment Facility Configuration 2

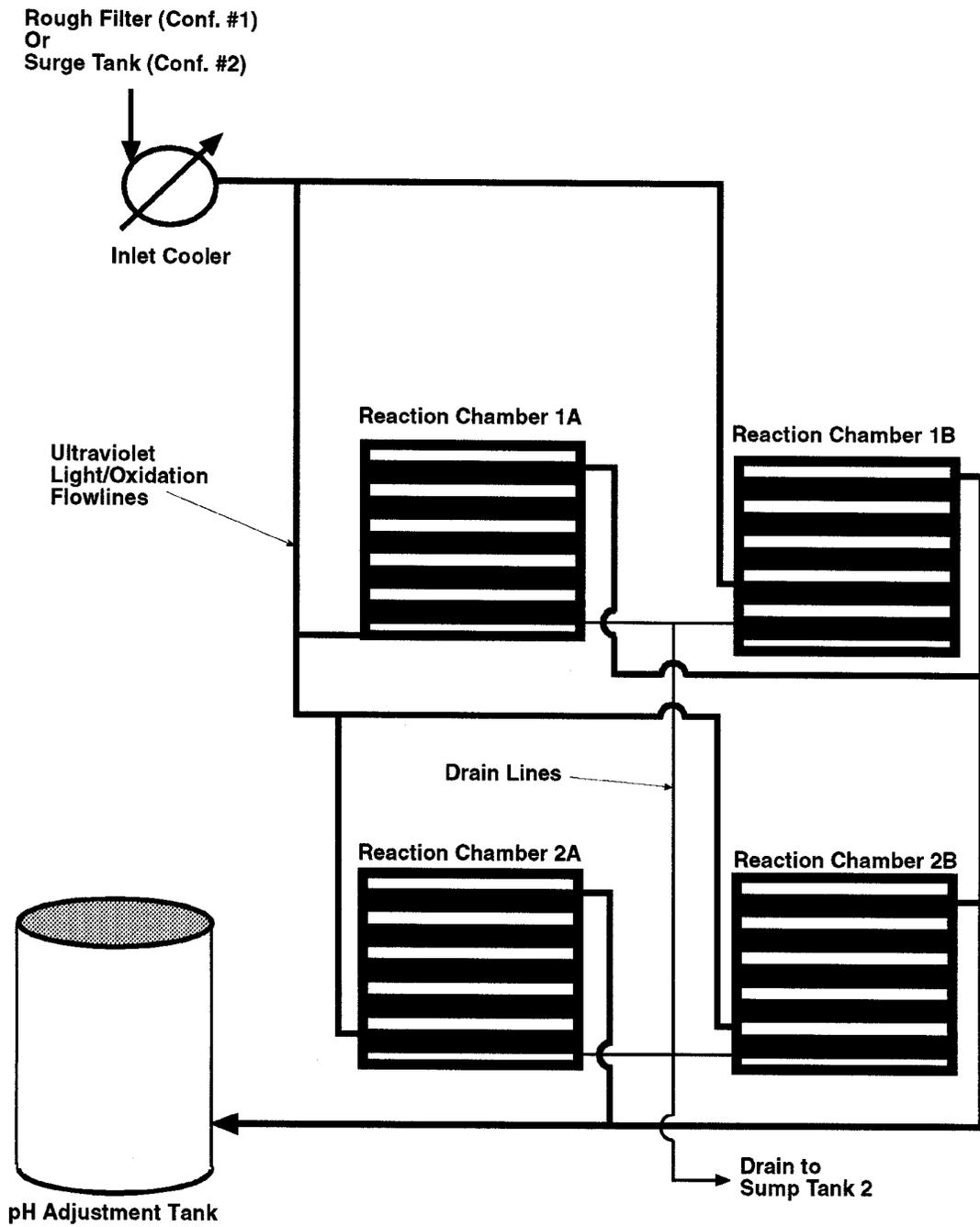


- Secondary Treatment Train**
- Note1: IX can be in either location
 - CONC Tank = Concentrate tank
 - Degas. = Degasification column
 - Eff. pH Adj. = Effluent pH adjustment tank
 - Evap = Evaporator
 - IX = Ion exchange
 - pH Adj. = pH adjustment tank
 - SWRT = Secondary waste receiving tank
 - TFD = Thin film dryer
 - UV/OX = Ultraviolet Oxidation

M0704-3.2
4-21-07

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Figure C.8. Ultraviolet Light/Oxidation Unit



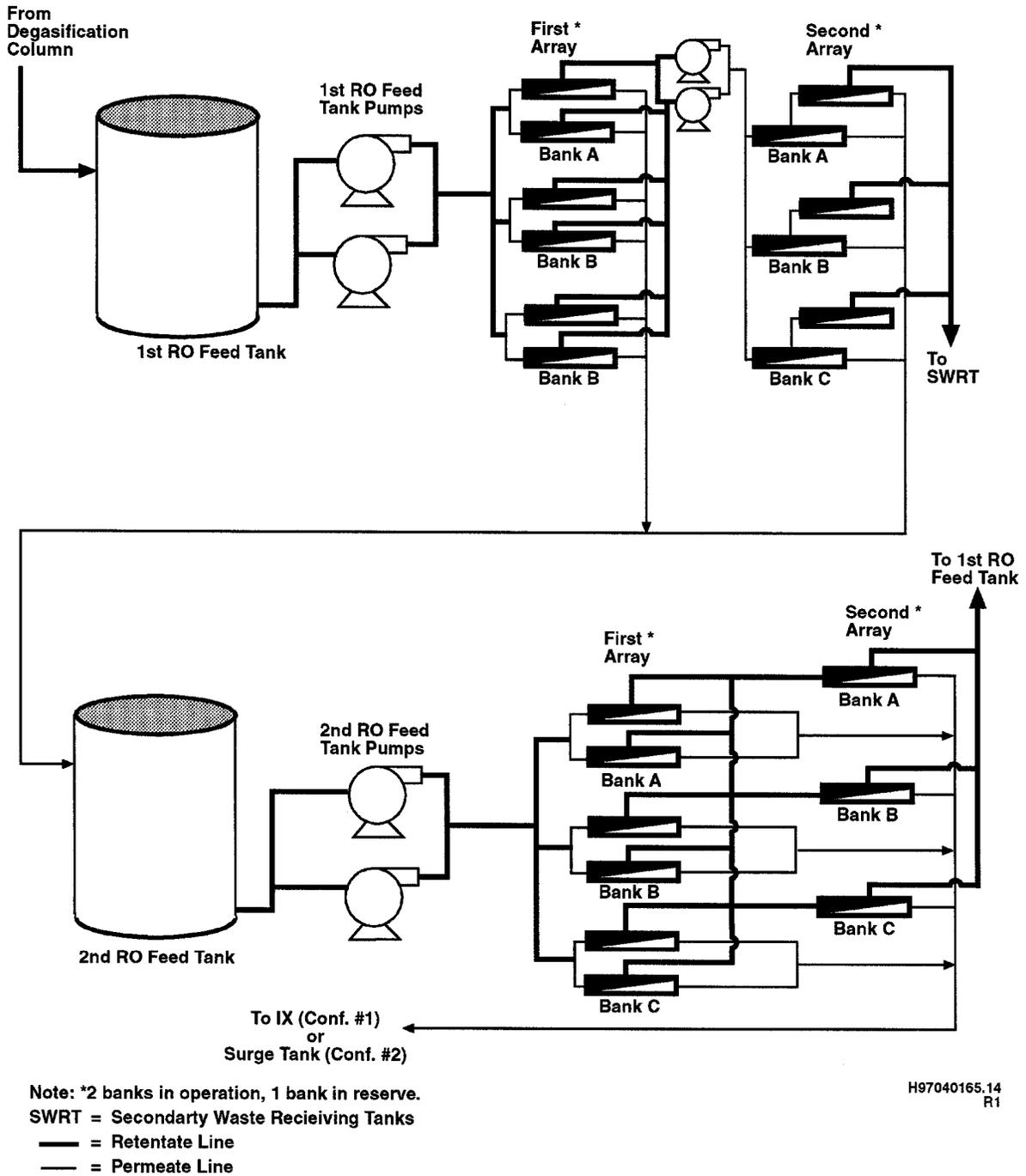
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Figure C.9. Reverse Osmosis Unit



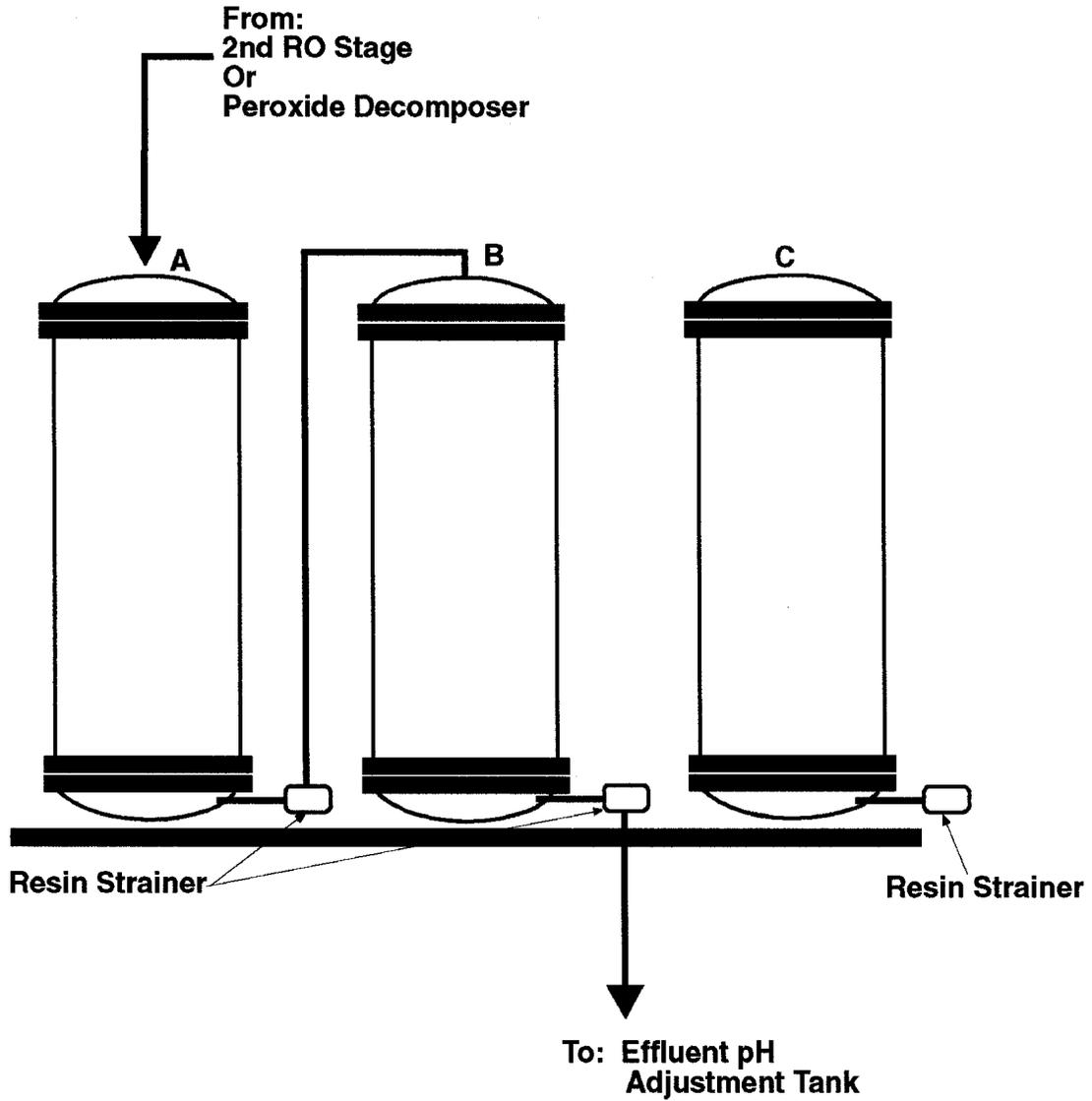
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Figure C.10. Ion Exchange Unit



**NOTE: Example Configuration- Column A and B in Operation,
Column C in Standby Mode**

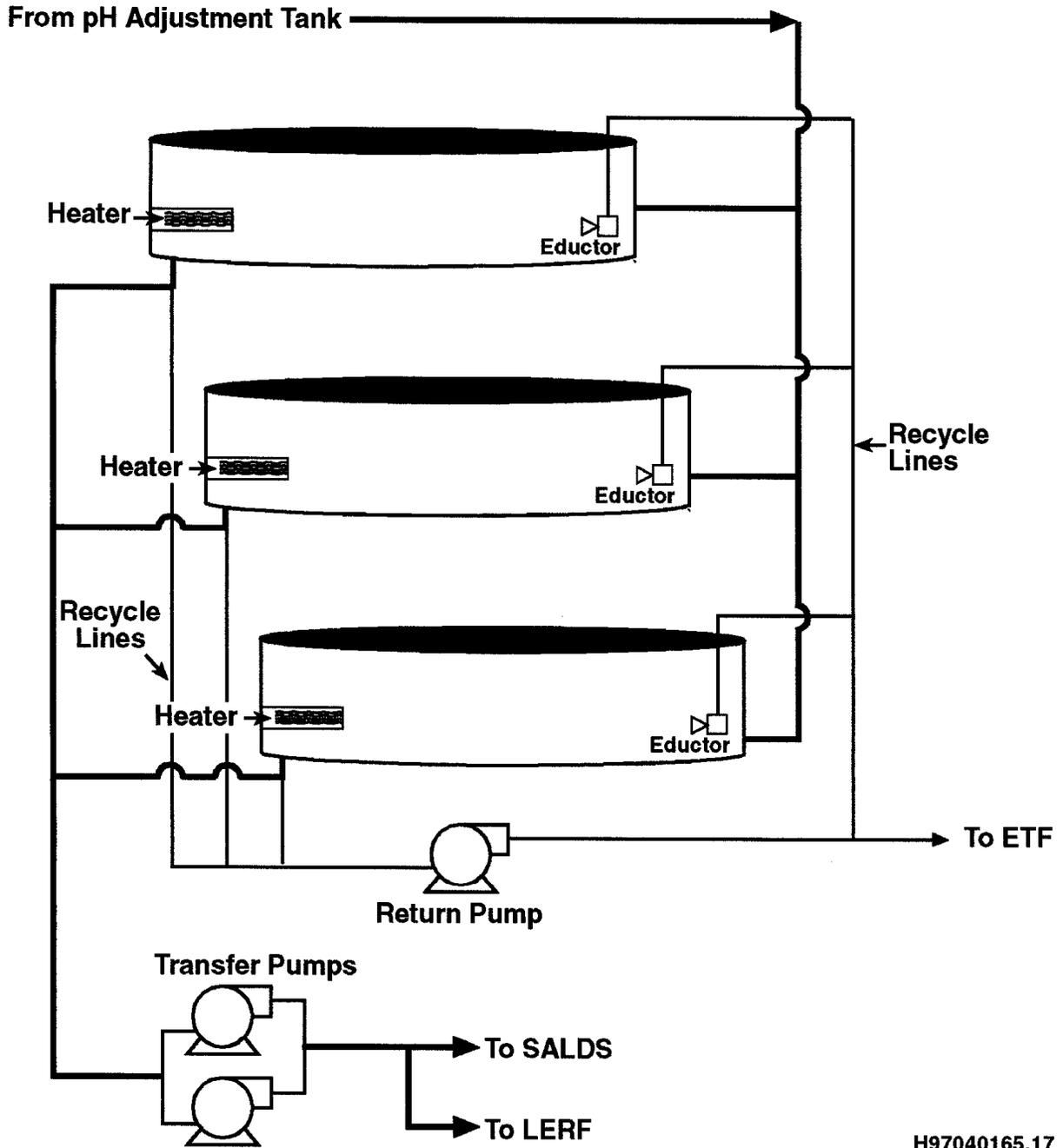
H97040165.18

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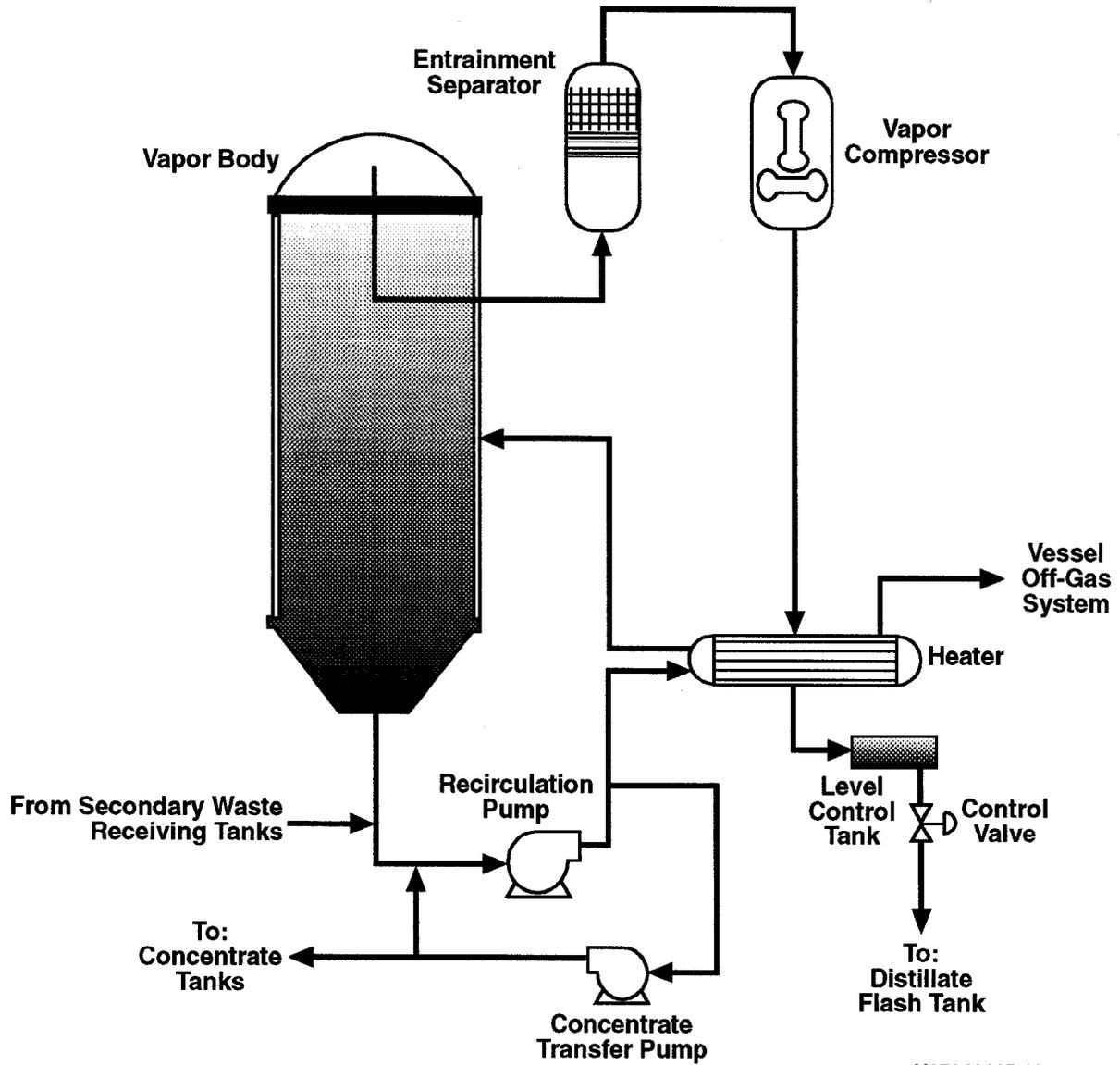
Figure C.11. Verification Tanks



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R1

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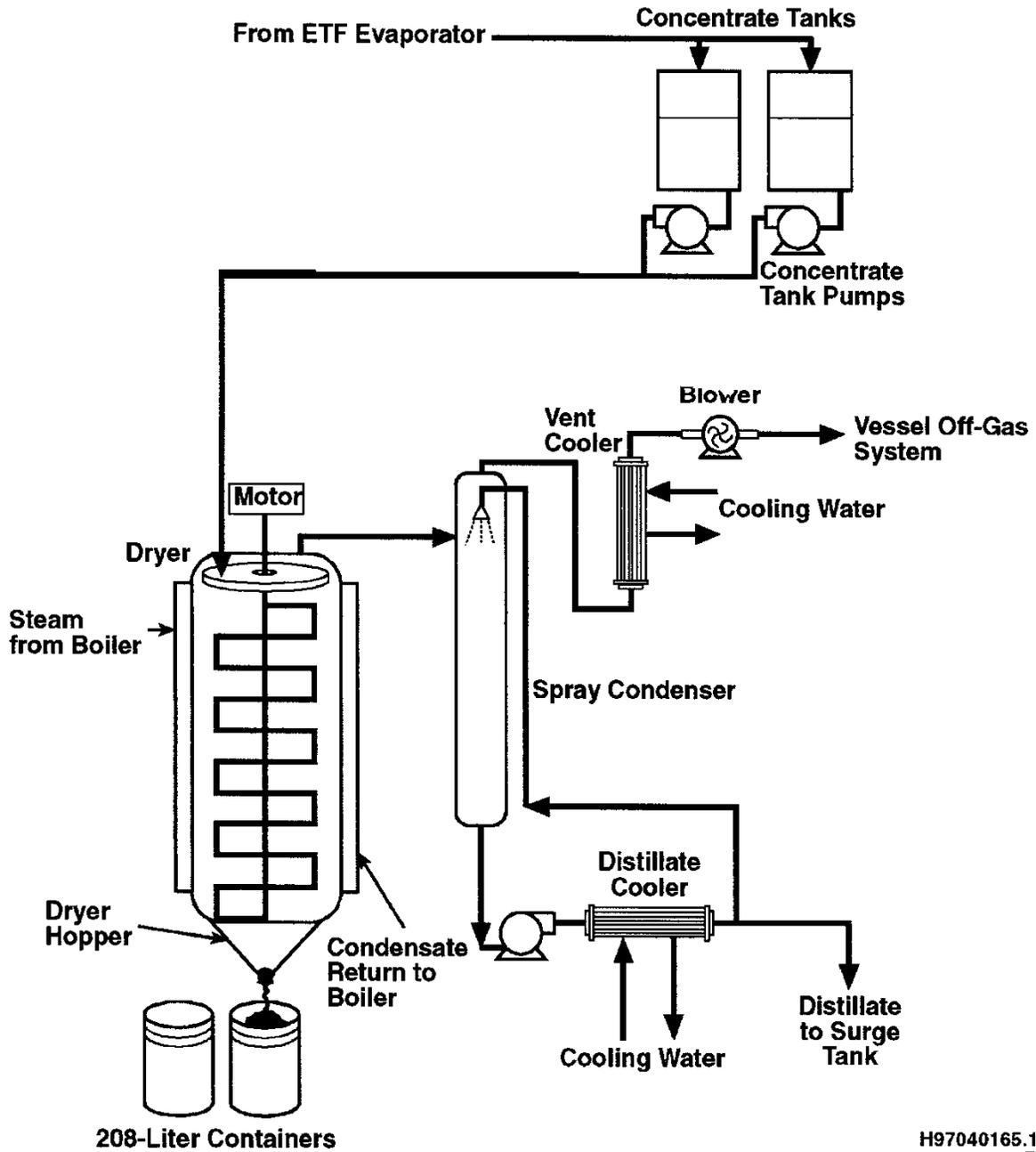
Figure C.12. Effluent Treatment Facility Evaporator



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R2

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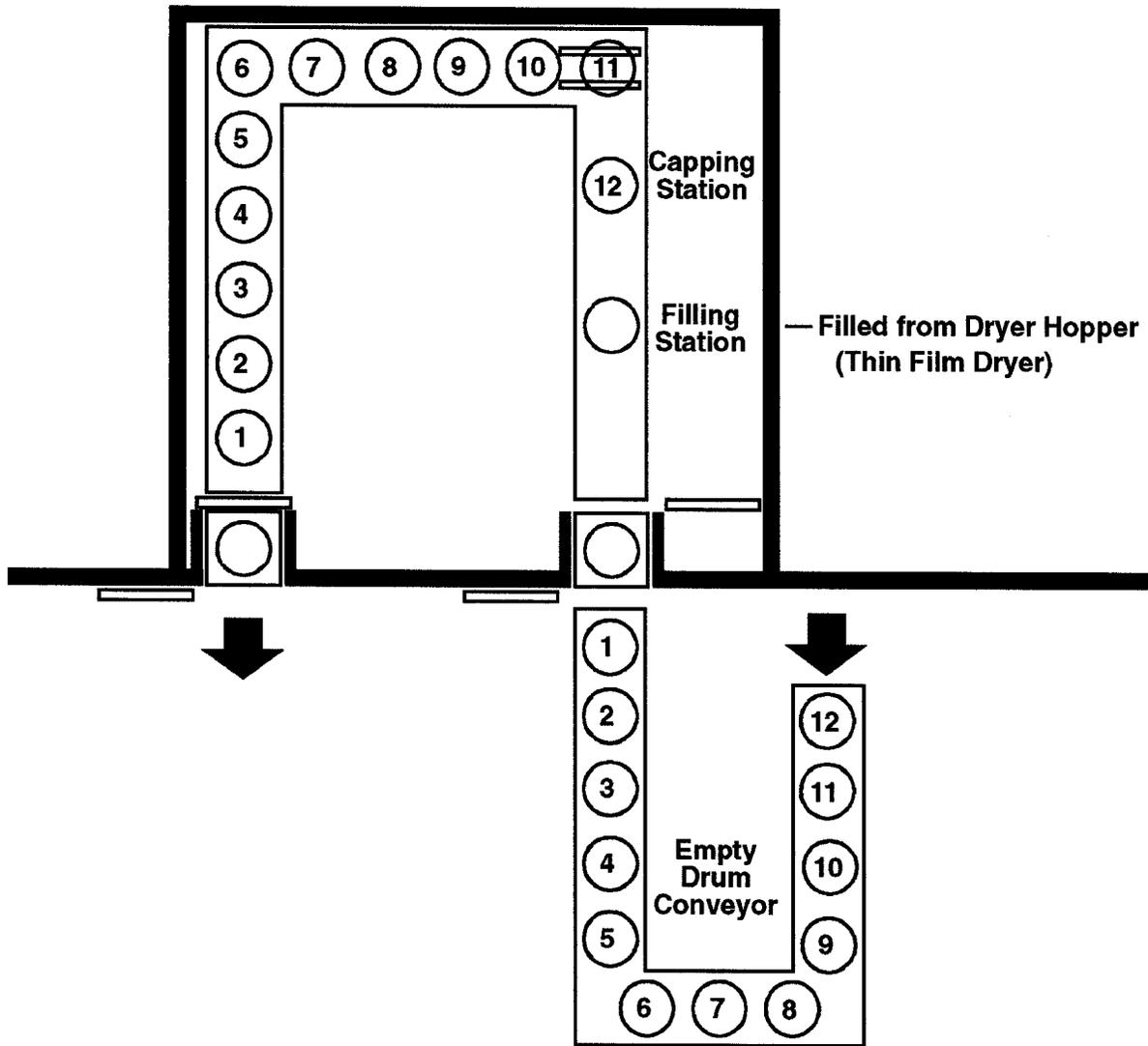
Figure C.13. Thin Film Dryer



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R1

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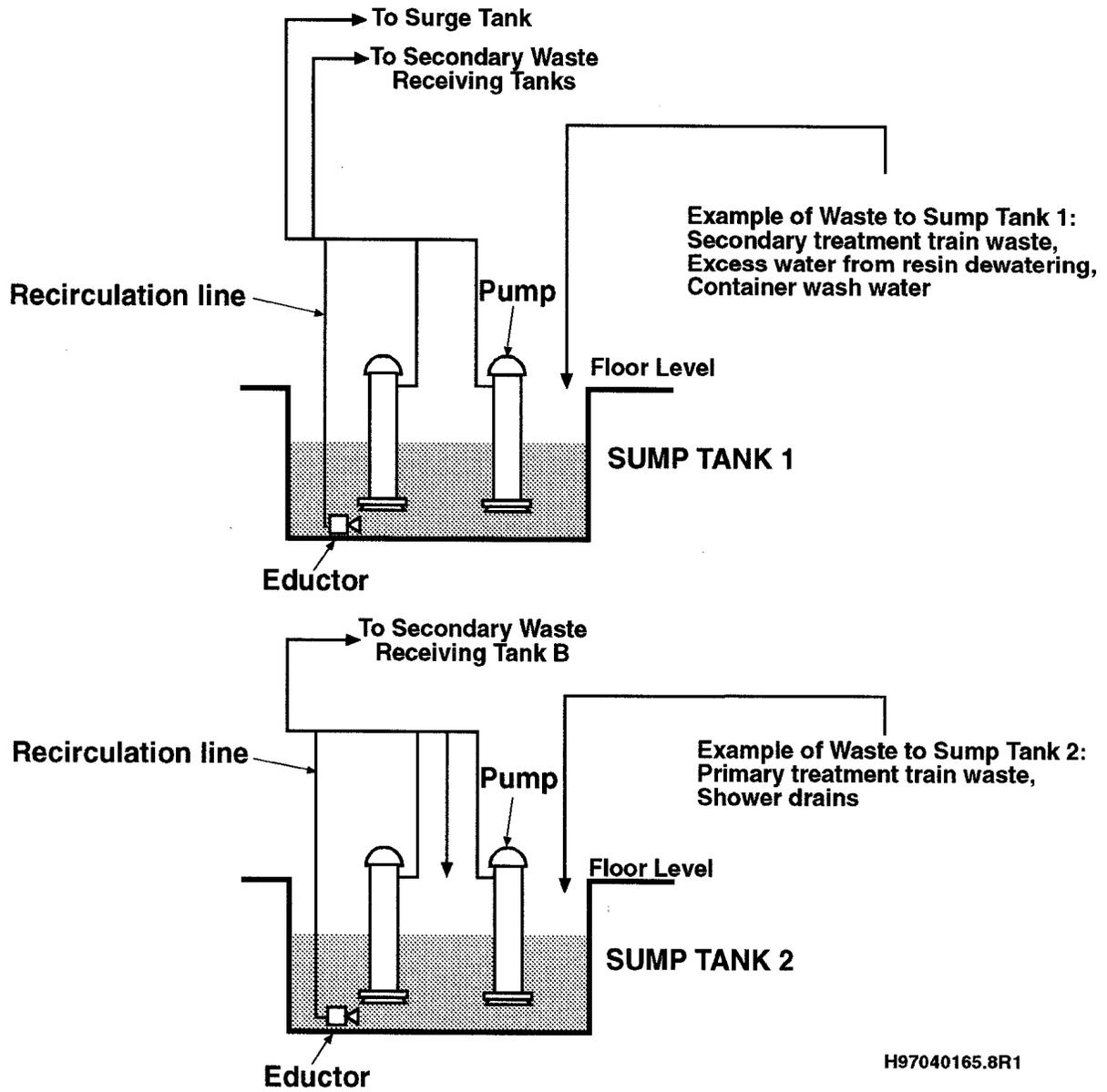
Figure C.14. Container Handling System



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R1

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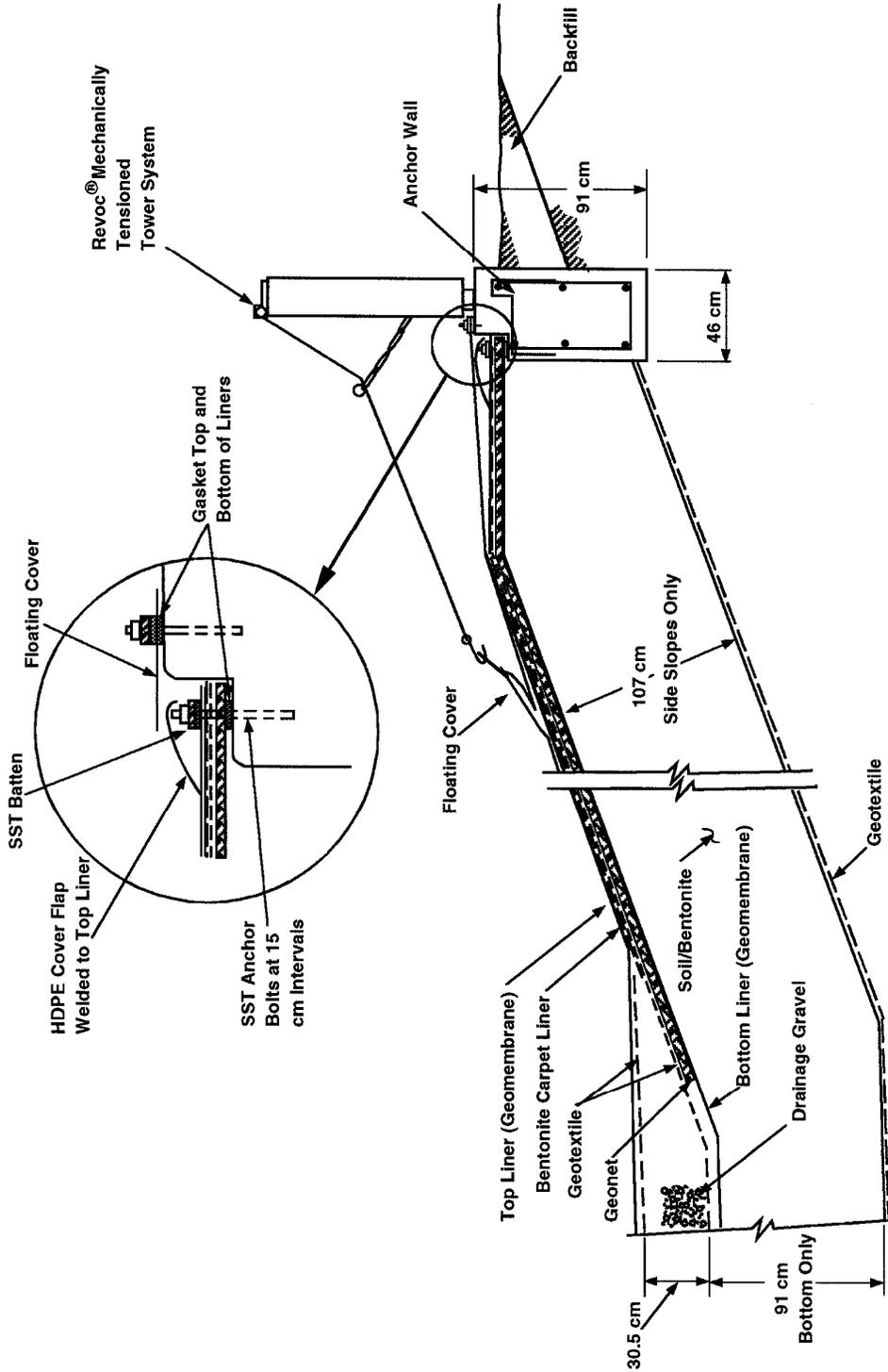
Figure C.15. Effluent Treatment Facility Sump Tanks



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Figure C.16. Liner Anchor Wall and Cover Tension System

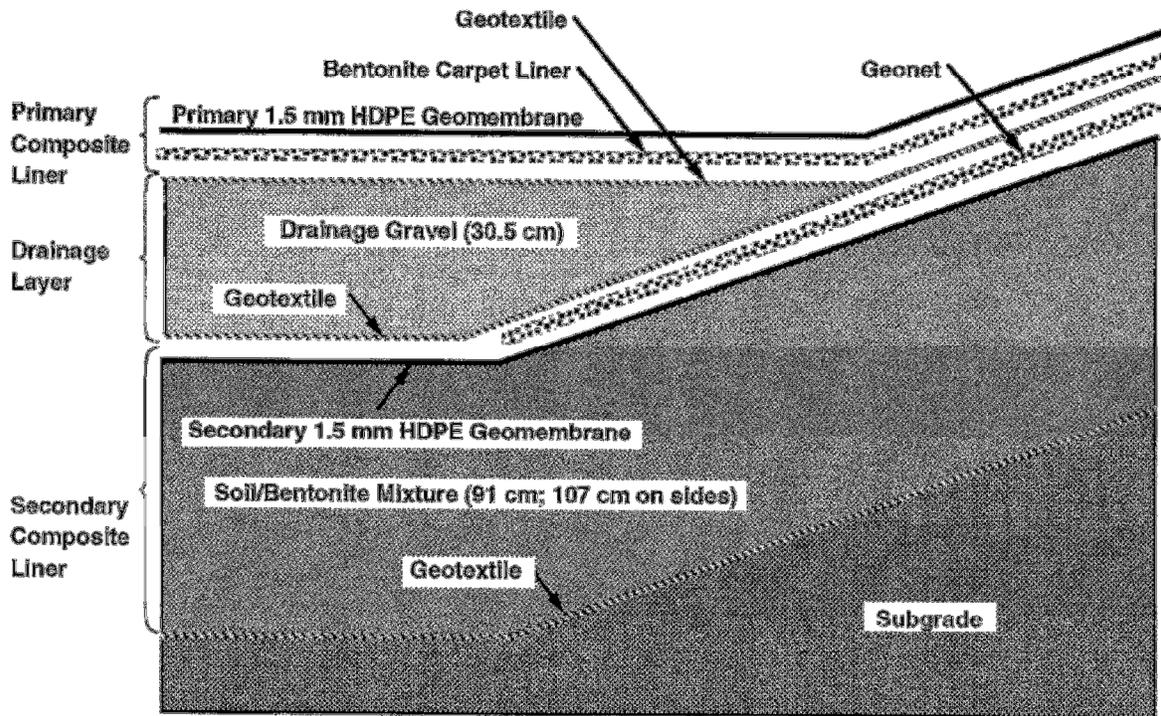


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© = Patented and licensed by CW Neal Corp, Santee, CA
Not to Scale

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Figure C.17. Liner System Schematic

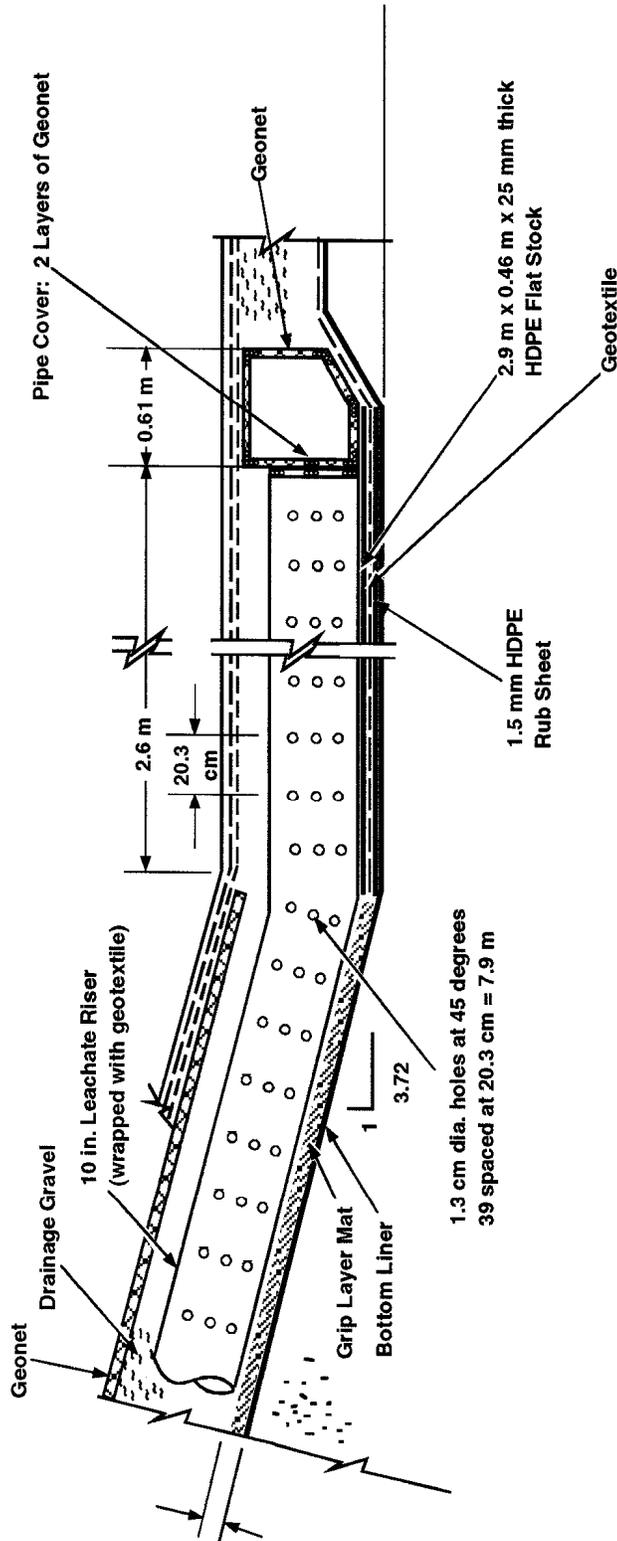


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Figure C.18. Detail of Leachate Collection Sump



Section View

HDPE: High Density Polyethylene
Not to Scale

H97040165.3

1 **Addendum F** **Preparedness and Prevention**

| | | | |
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| 2 | F. | PREPAREDNESS AND PREVENTION..... | F.1 |
| 3 | F.1 | PREPAREDNESS AND PREVENTION REQUIREMENTS..... | F.1 |
| 4 | F.1.1 | Equipment Requirements..... | F.1 |
| 5 | F.1.2 | Aisle Space Requirement..... | F.2 |
| 6 | F.2 | PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT..... | F.2 |
| 7 | F.2.1 | Unloading Operations, Spill Prevention, and Control..... | F.2 |
| 8 | F.2.2 | Runoff..... | F.2 |
| 9 | F.2.3 | Water Supplies..... | F.3 |
| 10 | F.2.4 | Equipment and Power Failure..... | F.3 |
| 11 | F.2.5 | Personnel Exposure..... | F.4 |
| 12 | F.3 | PREVENTION OF REACTION OF IGNITABLE, REACTIVE, AND INCOMPATIBLE | |
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1 **F. PREPAREDNESS AND PREVENTION**

2 **F.1 PREPAREDNESS AND PREVENTION REQUIREMENTS**

3 The following sections document the preparedness and prevention measures taken at LERF and 200 Area
4 ETF.

5 **F.1.1 Equipment Requirements**

6 The following sections describe the internal and external communications systems and the emergency
7 equipment required that could be activated by the LERF and 200 Area ETF Building Emergency
8 Director(BED).

9 **F.1.1.1 Internal Communications**

10 When operators are present at the LERF, the operators carry two-way radios to maintain contact with
11 200 Area ETF personnel. The operators at LERF are informed of emergencies (e.g., building and/or area
12 evacuations, take-cover events, high airborne contamination, fire, and/or explosion), and are provided
13 with emergency instructions by several systems. These systems include the mobile two-way radios, and
14 the telephone in the LERF instrument building.

15 The 200 Area ETF is equipped with an internal communication system to provide immediate emergency
16 instruction to personnel. The onsite communication system at the 200 Area ETF includes telephones,
17 mobile two-way radios, a public address system, and alarm systems. The telephone and radio systems
18 provide for internal and external communication. Alarm systems exist to allow personnel to respond
19 appropriately to various emergencies, including building evacuations, take cover events, and fire and/or
20 explosion. Addendum J provides additional information on the response activities.

21 **F.1.1.2 External Communications**

22 The LERF and its operators are equipped with devices for summoning emergency assistance from the
23 Hanford Fire Department, the Hazardous Materials Response Team, and/or Hanford patrol, as necessary.
24 External communication to summon emergency assistance is made by a normal telephone system or
25 mobile two-way radios. The LERF telephone is available in the instrumentation building. The 200 Area
26 ETF uses fire alarm pull boxes and telephones for external communication and are located at numerous
27 locations throughout the 200 Area ETF.

28 **F.1.1.3 Emergency Equipment**

29 The LERF and 200 Area ETF rely primarily on the Hanford Fire Department to respond to fires and other
30 emergencies as described in Permit Attachment 4, *Hanford Emergency Management Plan*,
31 (DOE/RL-94-02). All LERF and 200 Area ETF operators are familiar with the LERF and 200 Area ETF
32 contingency plans (Addendum J) and are trained in the use of emergency pumping of LERF and 200 Area
33 ETF systems, fire, and communications equipment.

34 Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination
35 equipment is available at various locations in the 200 Area ETF.

36 The 200 Area ETF has fire extinguishers, automatic fire suppression systems (200 Area ETF control room
37 and electrical room), fire alarm pull boxes, and a water spray system (200 Area ETF operating and
38 administrative portions).

39 Respirators, hazardous material protective gear, and special work procedure clothing for 200 Area ETF
40 personnel are kept in the change room at the 200 Area ETF. Safety showers are located in convenient

1 locations in the 200 Area ETF, and emergency eyewashes are available for use. Water for these devices
2 is supplied from the 200 Area ETF sanitary water system.

3 **F.1.1.4 Water for Fire Control**

4 A water main is not provided to the LERF. The Hanford Fire Department is equipped with fire engines
5 for fire control for fires requiring high water volume and pressure. The 200 Area ETF is serviced by two
6 12-inch raw water lines that are tied into the 200 East Area raw water distribution grids. These lines
7 provide a looped configuration that supplies two independent sources of raw water for fire protection and
8 raw water uses. Connections from the 200 Area ETF raw water system supply fire hydrants and the wet
9 pipe sprinkler system. In the event that water pressure is lost, the Hanford Fire Department is equipped
10 with fire engines to provide needed water.

11 **F.1.2 Aisle Space Requirement**

12 The operation of the LERF does not involve aisle space. Nevertheless, the LERF and the individual
13 basins are easily accessible to emergency response personnel and vehicles. A 6.1-meter-wide service
14 road runs along the base of the basin area on the east, south, and west sides within the operational security
15 fence.

16 Aisle spacing at 200 Area ETF is sufficient to allow the movement of personnel and fire protection
17 equipment in and around the containers. This storage arrangement also meets the requirements of the
18 National Fire Protection Association (NFPA 1996) for the protection of personnel and the environment.
19 A minimum 30-inch aisle space is maintained between rows of containers as required by
20 [WAC 173-303-630\(5\)\(c\)](#).

21 **F.2 PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT**

22 The following sections describe preventive procedures, structures, and equipment.

23 **F.2.1 Unloading Operations, Spill Prevention, and Control**

24 Underground pipelines that transfer aqueous waste to and from the LERF are encased in a secondary pipe.
25 If a leak is detected in a pipeline, flow in the pipeline will be stopped and the cause of the leak
26 investigated and remediated.

27 If it is required to transfer aqueous waste from one LERF basin to another, existing transfer pumps are
28 used as described in Addendum C.

29 The 200 Area ETF Load-in Station is monitored continuously during tank-filling operations and filling is
30 stopped immediately if leaks occur. Care is taken to ensure that even minor leaks are cleaned up
31 immediately and disposed of in accordance with approved management procedures. Any spill that is
32 determined to be a dangerous waste will be managed according to the requirements of [WAC 173-303](#).

33 **F.2.2 Runoff**

34 The LERF is constructed and operated to ensure that all aqueous waste is contained within the basins.
35 The basins are designed and operated to prevent overtopping. Furthermore, the basins are provided with
36 very low-density polyethylene floating covers to prevent the introduction of precipitation into the basins.
37 The basins also are graded to ensure that all precipitation outside the basins is directed away from the
38 surface impoundments.

39 The basins are constructed so that the top of the basin dikes are approximately 3 meters above grade. The
40 exterior side slopes of the basins have a 2.25 (horizontal) to 1 (vertical) slope. Run-on of precipitation to
41 the basins from the surrounding area is not possible because the surrounding area slopes away from the
42 LERF.

43 Dangerous waste and hazardous chemical handling areas at the 200 Area ETF are designed to contain
44 spills, leaks, and wash water, thereby preventing run-off and subsequent releases. All dangerous and/or

1 mixed waste loading and unloading areas are provided with secondary containment structures as
2 described in Addendum C, Process Information.

3 **F.2.3 Water Supplies**

4 The LERF uses operating practices, structures, and equipment to prevent the contamination of natural
5 water supplies (i.e., groundwater and surface water). The LERF is monitored closely during operation to
6 detect abnormal conditions (e.g., leaks), and regularly inspected to detect equipment and structural
7 deteriorations that could allow possible water supply contamination. The basins are provided with a
8 leachate collection system that is designed to contain any leachate generated. These systems, in
9 conjunction with the double-composite liner system and underlying low permeable clay liner, ensure that
10 should a release occur, the release will be fully contained within the basin configuration and, therefore,
11 water supplies will be protected. Addendum J, Contingency Plan, provides information on procedures
12 that are implemented if a release is detected at the LERF.

13 There are no drinking water wells near the 200 Area ETF. Therefore, a release would not immediately
14 contaminate drinking water supplies. The 200 Area ETF uses operating practices, structures, and
15 equipment to prevent the contamination of natural water supplies (i.e., groundwater and surface water).
16 The 200 Area ETF is monitored during operation to detect abnormal conditions, and is inspected regularly
17 to detect equipment and structural deteriorations that could allow spills to the environment. Areas in
18 contact with dangerous and/or mixed waste are monitored continuously during operation through a series
19 of level and pressure indicators, leak detection alarms, equipment failure alarms, and control panel
20 readouts. In addition, the 200 Area ETF is inspected regularly for the presence of leaks or other off
21 normal conditions wherever possible (in all areas that can be safely entered).

22 In addition to detailed operating practices, structures and equipment are used at the 200 Area ETF to
23 prevent contamination of water supplies. The structures and equipment designed to prevent
24 contamination of water supplies are the same as the structures and equipment used to prevent run-off from
25 dangerous and/or mixed waste handling areas.

26 **F.2.4 Equipment and Power Failure**

27 The storage function of the LERF is not affected by loss of power and a temporary loss of power would
28 not pose a threat to the environment. Loss of electrical power would not cause the storage of the waste to
29 be jeopardized. For process condensate transferred from the 242-A Evaporator, appropriate valving
30 procedures are followed to ensure a smooth restart of the flow to the LERF in the event of a power failure
31 at the 242-A Evaporator.

32 The 200 Area ETF does not have a standby power source. Power to selected lighting, computers, and
33 process controls is configured with an uninterruptible power supply. During partial loss of normal power,
34 the effected pumps and subsystems will be shut down. Complete loss of power to the 200 Area ETF
35 shuts down the entire 200 Area ETF except for the instruments in the control room connected to the
36 uninterruptible power supply. Redundant pumps allow the process to continue to operate when only one
37 component is out of service.

38 When power at the 200 Area ETF is lost, the valves assume a fail-safe position to allow the process to
39 remain in a safe shutdown mode until restoration of power. This action allows the operators to perform
40 equipment surveys during shutdown and to confirm that there are no safety issues because the 200 Area
41 ETF is shut down. Because a power failure would also shutoff flow into the 200 Area ETF, there will not
42 be any increase in volume in any of the holdup basins, tanks, or other systems.

43 A combination of reliability, redundancy, maintenance, and repair features are used in the 200 Area ETF
44 equipment and systems to minimize random failure of equipment. For crucial systems such as ventilation
45 filters, redundant trains are provided to mitigate equipment and system failure. Spare parts are
46 maintained for essential production and safety equipment.

1 **F.2.5 Personnel Exposure**

2 At the LERF and 200 Area ETF, operating practices, structures, and equipment are used to prevent undue
3 exposure of personnel to dangerous and/or mixed waste. All personnel handling waste use protective
4 clothing and equipment. All operations are conducted so that exposure to dangerous and/or mixed waste
5 and hazardous materials are maintained ALARA.

6 Protective clothing and equipment are prescribed for personnel handling chemicals or dangerous waste.
7 Before the start of any operation that could expose personnel to the risk of injury or illness, a review of
8 the operation is performed to ensure that the nature of hazards that might be encountered is considered
9 and appropriate protective gear is selected. Personnel are instructed to wear personal protective
10 equipment in accordance with training, posting, and instructions.

11 A change trailer at LERF is located between Basins 42 and 43. In addition, the change trailer has an
12 operations office for working with procedures. Exits within the change trailer are clearly marked. A
13 storage building is located within the perimeter fence, northwest of the basins. The LERF storage
14 building also is provided with separate storage areas for clean and contaminated equipment. A
15 decontamination shower and decontamination building is located at the 272-AW Building, approximately
16 1.6 kilometers from the LERF or at the 200 Area ETF.

17 The 200 Area ETF has eyewash stations and safety showers in convenient locations for use by personnel.
18 The following structures and equipment were incorporated into the 200 Area ETF design to minimize
19 personnel exposure.

- 20 • Offices, control room, clean- and soiled-clothes storage areas, change rooms, and the lunchroom are
21 situated to minimize casual exposure of personnel.
- 22 • Building exit pathways are located to provide rapid egress in emergency evacuations.
- 23 • Emergency lighting devices are located strategically throughout the 200 Area ETF.
- 24 • Audio and/or visual alarms are provided for all room air samplers, area alarms, and liquid monitors.
25 Visual readouts for these alarm systems are located in less contaminated areas to minimize exposure
26 to personnel.
- 27 • Areas for decontaminating and maintaining equipment are provided in contaminated areas to limit the
28 spread of contamination to uncontaminated areas such as the control room.
- 29 • Instrument interlock systems automatically return process operations to a safe condition if an unsafe
30 condition should occur.
- 31 • The 200 Area ETF ventilation systems are designed to provide airflow from uncontaminated zones to
32 progressively more contaminated zones.

33 Whenever possible, exposures to hazards are controlled by accepted engineering and/or administrative
34 controls. Protective gear is used where effective engineering or administrative controls are not feasible.

35 **F.3 PREVENTION OF REACTION OF IGNITABLE, REACTIVE, AND INCOMPATIBLE**
36 **WASTE**

37 Typically, aqueous waste managed at the LERF or 200 Area ETF does not display the characteristics of
38 reactivity or ignitability. Any aqueous waste streams exhibiting these characteristics are blended or
39 mixed at LERF to a concentration where the waste no longer exhibits reactive or ignitable characteristics.

40 Incompatible aqueous waste is not expected to be stored or treated at the LERF or 200 Area ETF
41 (Addendum B, Waste Analysis Plan). Therefore, the requirements of [WAC 173-303-806\(4\)\(a\)](#) are not
42 applicable.

43

1 **Addendum F** **Preparedness and Prevention**

2 F. PREPAREDNESS AND PREVENTION.....F.1

3 F.1 PREPAREDNESS AND PREVENTION REQUIREMENTS..... F.1

4 F.1.1 Equipment Requirements..... F.1

5 F.1.2 Aisle Space Requirement..... F.2

6 F.2 PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT F.2

7 F.2.1 Unloading Operations, Spill Prevention, and Control F.2

8 F.2.2 Runoff F.2

9 F.2.3 Water Supplies F.3

10 F.2.4 Equipment and Power Failure..... F.3

11 F.2.5 Personnel Exposure..... F.4

12 F.3 PREVENTION OF REACTION OF IGNITABLE, REACTIVE, AND INCOMPATIBLE

13 WASTE..... F.4

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F. PREPAREDNESS AND PREVENTION

F.1 PREPAREDNESS AND PREVENTION REQUIREMENTS

The following sections document the preparedness and prevention measures taken at LERF and 200 Area ETF.

F.1.1 Equipment Requirements

The following sections describe the internal and external communications systems and the emergency equipment required that could be activated by the LERF and 200 Area ETF Building Emergency Director(BED).

F.1.1.1 Internal Communications

When operators are present at the LERF, the operators carry two-way radios to maintain contact with 200 Area ETF personnel. The operators at LERF are informed of emergencies (e.g., building and/or area evacuations, take-cover events, high airborne contamination, fire, and/or explosion), and are provided with emergency instructions by several systems. These systems include the mobile two-way radios, and the telephone in the LERF instrument building.

The 200 Area ETF is equipped with an internal communication system to provide immediate emergency instruction to personnel. The onsite communication system at the 200 Area ETF includes telephones, mobile two-way radios, a public address system, and alarm systems. The telephone and radio systems provide for internal and external communication. Alarm systems exist to allow personnel to respond appropriately to various emergencies, including building evacuations, take cover events, and fire and/or explosion. Addendum J provides additional information on the response activities.

F.1.1.2 External Communications

The LERF and its operators are equipped with devices for summoning emergency assistance from the Hanford Fire Department, the Hazardous Materials Response Team, and/or Hanford patrol, as necessary. External communication to summon emergency assistance is made by a normal telephone system or mobile two-way radios. The LERF telephone is available in the instrumentation building. The 200 Area ETF uses fire alarm pull boxes and telephones for external communication and are located at numerous locations throughout the 200 Area ETF.

F.1.1.3 Emergency Equipment

The LERF and 200 Area ETF rely primarily on the Hanford Fire Department to respond to fires and other emergencies as described in Permit Attachment 4, *Hanford Emergency Management Plan*, (DOE/RL-94-02). All LERF and 200 Area ETF operators are familiar with the LERF and 200 Area ETF contingency plans (Addendum J) and are trained in the use of emergency pumping of LERF and 200 Area ETF systems, fire, and communications equipment.

Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment is available at various locations in the 200 Area ETF.

The 200 Area ETF has fire extinguishers, automatic fire suppression systems (200 Area ETF control room and electrical room), fire alarm pull boxes, and a water spray system (200 Area ETF operating and administrative portions).

Respirators, hazardous material protective gear, and special work procedure clothing for 200 Area ETF personnel are kept in the change room at the 200 Area ETF. Safety showers are located in convenient

1 locations in the 200 Area ETF, and emergency eyewashes are available for use. Water for these devices
2 is supplied from the 200 Area ETF sanitary water system.

3 **F.1.1.4 Water for Fire Control**

4 A water main is not provided to the LERF. The Hanford Fire Department is equipped with fire engines
5 for fire control for fires requiring high water volume and pressure. The 200 Area ETF is serviced by two
6 12-inch raw water lines that are tied into the 200 East Area raw water distribution grids. These lines
7 provide a looped configuration that supplies two independent sources of raw water for fire protection and
8 raw water uses. Connections from the 200 Area ETF raw water system supply fire hydrants and the wet
9 pipe sprinkler system. In the event that water pressure is lost, the Hanford Fire Department is equipped
10 with fire engines to provide needed water.

11 **F.1.2 Aisle Space Requirement**

12 The operation of the LERF does not involve aisle space. Nevertheless, the LERF and the individual
13 basins are easily accessible to emergency response personnel and vehicles. A 6.1-meter-wide service
14 road runs along the base of the basin area on the east, south, and west sides within the operational security
15 fence.

16 Aisle spacing at 200 Area ETF is sufficient to allow the movement of personnel and fire protection
17 equipment in and around the containers. This storage arrangement also meets the requirements of the
18 National Fire Protection Association (NFPA 1996) for the protection of personnel and the environment.
19 A minimum 30-inch aisle space is maintained between rows of containers as required by
20 [WAC 173-303-630\(5\)\(c\)](#).

21 **F.2 PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT**

22 The following sections describe preventive procedures, structures, and equipment.

23 **F.2.1 Unloading Operations, Spill Prevention, and Control**

24 Underground pipelines that transfer aqueous waste to and from the LERF are encased in a secondary pipe.
25 If a leak is detected in a pipeline, flow in the pipeline will be stopped and the cause of the leak
26 investigated and remediated.

27 If it is required to transfer aqueous waste from one LERF basin to another, [existing transfer pumps are](#)
28 [used as described in Addendum C.](#) ~~submersible pumps are located in risers at the northwest corner of a~~
29 ~~basin. Valves are closed or opened depending on the direction of the fluid transfer. Pumps are started,~~
30 ~~providing a cumulative flow of between 2,000 and 3,000 liters per minute into another basin.~~

31 The 200 Area ETF Load-in Station is monitored continuously during tank-filling operations and filling is
32 stopped immediately if leaks occur. Care is taken to ensure that even minor leaks are cleaned up
33 immediately and disposed of in accordance with approved management procedures. Any spill that is
34 determined to be a dangerous waste will be managed according to the requirements of [WAC 173-303](#).

35 **F.2.2 Runoff**

36 The LERF is constructed and operated to ensure that all aqueous waste is contained within the basins.
37 The basins are designed and operated to prevent overtopping. Furthermore, the basins are provided with
38 very low-density polyethylene floating covers to prevent the introduction of precipitation into the basins.
39 The basins also are graded to ensure that all precipitation outside the basins is directed away from the
40 surface impoundments.

41 The basins are constructed so that the top of the basin dikes are approximately 3 meters above grade. The
42 exterior side slopes of the basins have a 2.25 (horizontal) to 1 (vertical) slope. Run-on of precipitation to
43 the basins from the surrounding area is not possible because the surrounding area slopes away from the
44 LERF.

1 Dangerous waste and hazardous chemical handling areas at the 200 Area ETF are designed to contain
2 spills, leaks, and wash water, thereby preventing run-off and subsequent releases. All dangerous and/or
3 mixed waste loading and unloading areas are provided with secondary containment structures as
4 described in Addendum C, Process Information.

5 **F.2.3 Water Supplies**

6 The LERF uses operating practices, structures, and equipment to prevent the contamination of natural
7 water supplies (i.e., groundwater and surface water). The LERF is monitored closely during operation to
8 detect abnormal conditions (e.g., leaks), and regularly inspected to detect equipment and structural
9 deteriorations that could allow possible water supply contamination. The basins are provided with a
10 leachate collection system that is designed to contain any leachate generated. These systems, in
11 conjunction with the double-composite liner system and underlying low permeable clay liner, ensure that
12 should a release occur, the release will be fully contained within the basin configuration and, therefore,
13 water supplies will be protected. Addendum J, Contingency Plan, provides information on procedures
14 that are implemented if a release is detected at the LERF.

15 There are no drinking water wells near the 200 Area ETF. Therefore, a release would not immediately
16 contaminate drinking water supplies. The 200 Area ETF uses operating practices, structures, and
17 equipment to prevent the contamination of natural water supplies (i.e., groundwater and surface water).
18 The 200 Area ETF is monitored during operation to detect abnormal conditions, and is inspected regularly
19 to detect equipment and structural deteriorations that could allow spills to the environment. Areas in
20 contact with dangerous and/or mixed waste are monitored continuously during operation through a series
21 of level and pressure indicators, leak detection alarms, equipment failure alarms, and control panel
22 readouts. In addition, the 200 Area ETF is inspected regularly for the presence of leaks or other off
23 normal conditions wherever possible (in all areas that can be safely entered).

24 In addition to detailed operating practices, structures and equipment are used at the 200 Area ETF to
25 prevent contamination of water supplies. The structures and equipment designed to prevent
26 contamination of water supplies are the same as the structures and equipment used to prevent run-off from
27 dangerous and/or mixed waste handling areas.

28 **F.2.4 Equipment and Power Failure**

29 The storage function of the LERF is not affected by loss of power and a temporary loss of power would
30 not pose a threat to the environment. Loss of electrical power would not cause the storage of the waste to
31 be jeopardized. For process condensate transferred from the 242-A Evaporator, appropriate valving
32 procedures are followed to ensure a smooth restart of the flow to the LERF in the event of a power failure
33 at the 242-A Evaporator.

34 The 200 Area ETF does not have a standby power source. Power to selected lighting, computers, and
35 process controls is configured with an uninterruptible power supply. During partial loss of normal power,
36 the effected pumps and subsystems will be shut down. Complete loss of power to the 200 Area ETF
37 shuts down the entire 200 Area ETF except for the instruments in the control room connected to the
38 uninterruptible power supply. Redundant pumps allow the process to continue to operate when only one
39 component is out of service.

40 When power at the 200 Area ETF is lost, the valves assume a fail-safe position to allow the process to
41 remain in a safe shutdown mode until restoration of power. This action allows the operators to perform
42 equipment surveys during shutdown and to confirm that there are no safety issues because the 200 Area
43 ETF is shut down. Because a power failure would also shutoff flow into the 200 Area ETF, there will not
44 be any increase in volume in any of the holdup basins, tanks, or other systems.

45 A combination of reliability, redundancy, maintenance, and repair features are used in the 200 Area ETF
46 equipment and systems to minimize random failure of equipment. For crucial systems such as ventilation
47 filters, redundant trains are provided to mitigate equipment and system failure. Spare parts are
48 maintained for essential production and safety equipment.

1 **F.2.5 Personnel Exposure**

2 At the LERF and 200 Area ETF, operating practices, structures, and equipment are used to prevent undue
3 exposure of personnel to dangerous and/or mixed waste. All personnel handling waste use protective
4 clothing and equipment. All operations are conducted so that exposure to dangerous and/or mixed waste
5 and hazardous materials are maintained ALARA.

6 Protective clothing and equipment are prescribed for personnel handling chemicals or dangerous waste.
7 Before the start of any operation that could expose personnel to the risk of injury or illness, a review of
8 the operation is performed to ensure that the nature of hazards that might be encountered is considered
9 and appropriate protective gear is selected. Personnel are instructed to wear personal protective
10 equipment in accordance with training, posting, and instructions.

11 A change trailer at LERF is located between Basins 42 and 43. In addition, the change trailer has an
12 operations office for working with procedures. Exits within the change trailer are clearly marked. A
13 storage building is located within the perimeter fence, northwest of the basins. The LERF storage
14 building also is provided with separate storage areas for clean and contaminated equipment. A
15 decontamination shower and decontamination building is located at the 272-AW Building, approximately
16 1.6 kilometers from the LERF or at the 200 Area ETF.

17 The 200 Area ETF has eyewash stations and safety showers in convenient locations for use by personnel.
18 The following structures and equipment were incorporated into the 200 Area ETF design to minimize
19 personnel exposure.

- 20 • Offices, control room, clean- and soiled-clothes storage areas, change rooms, and the lunchroom are
21 situated to minimize casual exposure of personnel.
- 22 • Building exit pathways are located to provide rapid egress in emergency evacuations.
- 23 • Emergency lighting devices are located strategically throughout the 200 Area ETF.
- 24 • Audio and/or visual alarms are provided for all room air samplers, area alarms, and liquid monitors.
25 Visual readouts for these alarm systems are located in less contaminated areas to minimize exposure
26 to personnel.
- 27 • Areas for decontaminating and maintaining equipment are provided in contaminated areas to limit the
28 spread of contamination to uncontaminated areas such as the control room.
- 29 • Instrument interlock systems automatically return process operations to a safe condition if an unsafe
30 condition should occur.
- 31 • The 200 Area ETF ventilation systems are designed to provide airflow from uncontaminated zones to
32 progressively more contaminated zones.

33 Whenever possible, exposures to hazards are controlled by accepted engineering and/or administrative
34 controls. Protective gear is used where effective engineering or administrative controls are not feasible.

35 **F.3 PREVENTION OF REACTION OF IGNITABLE, REACTIVE, AND INCOMPATIBLE**
36 **WASTE**

37 Typically, aqueous waste managed at the LERF or 200 Area ETF does not display the characteristics of
38 reactivity or ignitability. Any aqueous waste streams exhibiting these characteristics are blended or
39 mixed at LERF to a concentration where the waste no longer exhibits reactive or ignitable characteristics.

40 Incompatible aqueous waste is not expected to be stored or treated at the LERF or 200 Area ETF
41 (Addendum B, Waste Analysis Plan). Therefore, the requirements of [WAC 173-303-806\(4\)\(a\)](#) are not
42 applicable.

| | | | | | | |
|---|---|---|-----------------------------------|---|--------|--|
|  | | WASHINGTON STATE DEPARTMENT OF ECOLOGY | | Addendum A Part A Form | | |
| Date Received | | Reviewed by: | | Date: | | |
| Month | Day | Year | Approved by: | | Date: | |
| | | | | | | |
| I. This form is submitted to: (place an "X" in the appropriate box) | | | | | | |
| <input checked="" type="checkbox"/> | Request modification to a final status permit (commonly called a "Part B" permit) | | | | | |
| <input type="checkbox"/> | Request a change under interim status | | | | | |
| <input type="checkbox"/> | Apply for a final status permit. This includes the application for the initial final status permit for a site or for a permit renewal (i.e., a new permit to replace an expiring permit). | | | | | |
| <input type="checkbox"/> | Establish interim status because of the wastes newly regulated on: | | | | (Date) | |
| List waste codes: | | | | | | |
| II. EPA/State ID Number | | | | | | |
| W | A | 7 | 8 | 9 | 0 | |
| 0 | 0 | 0 | 8 | 9 | 6 | |
| 7 | | | | | | |
| III. Name of Facility | | | | | | |
| US Department of Energy – Hanford Facility | | | | | | |
| IV. Facility Location (Physical address not P.O. Box or Route Number) | | | | | | |
| A. Street | | | | | | |
| 825 Jadwin | | | | | | |
| City or Town | | | State | ZIP Code | | |
| Richland | | | WA | 99352 | | |
| County Code (if) | | County Name | | | | |
| 0 | 0 | 5 | Benton | | | |
| B. Land Type | C. Geographic Location | | D. Facility Existence Date | | | |
| | Latitude (degrees, mins, secs) | | Longitude (degrees, mins, secs) | | | |
| | | | | | | |
| F | Refer to TOPO Map (Section XV.) | | 0 | 3 | 0 | |
| | | | 2 | 1 | 9 | |
| | | | | 4 | 3 | |
| V. Facility Mailing Address | | | | | | |
| Street or P.O. Box | | | | | | |
| P.O. Box 550 | | | | | | |
| City or Town | | | State | ZIP Code | | |
| Richland | | | WA | 99352 | | |

| VI. Facility contact (Person to be contacted regarding waste activities at facility) | | | | | | | | | | | | | |
|---|--|---|---|---|---|--|---|--|---|-------------------------------------|------|---|--|
| Name (last) | | | | | | (first) | | | | | | | |
| McCormick | | | | | | Matthew | | | | | | | |
| Job Title | | | | | | Phone Number (area code and number) | | | | | | | |
| Manager | | | | | | (509) 376-7395 | | | | | | | |
| Contact Address | | | | | | | | | | | | | |
| Street or P.O. Box | | | | | | | | | | | | | |
| P.O. Box 550 | | | | | | | | | | | | | |
| City or Town | | | | | | State | | ZIP Code | | | | | |
| Richland | | | | | | WA | | 99352 | | | | | |
| VII. Facility Operator Information | | | | | | | | | | | | | |
| A. Name | | | | | | | | | | Phone Number | | | |
| Department of Energy Owner/Operator CH2M HILL Plateau Remediation Company Co-Operator for LERF & 200 Area ETF* | | | | | | | | | | (509) 376-7395 (509) 376-0556* | | | |
| Street or P.O. Box | | | | | | | | | | | | | |
| P.O. Box 550 P.O. Box 1600 * | | | | | | | | | | | | | |
| City or Town | | | | | | State | | ZIP Code | | | | | |
| Richland | | | | | | WA | | 99352 | | | | | |
| B. Operator Type | | F | | | | | | | | | | | |
| C. Does the name in VII.A reflect a proposed change in operator? | | | | | | <input type="checkbox"/> Yes | | <input checked="" type="checkbox"/> No | | | | | Co-Operator* change |
| If yes, provide the scheduled date for the change: | | | | | | Month | | Day | | | Year | | |
| | | 1 | 0 | | | 0 | 1 | | 2 | 0 | 0 | 8 | |
| D. Is the name listed in VII.A. also the owner? If yes, skip to Section VIII.C. | | | | | | | | | | <input type="checkbox"/> Yes | | | <input checked="" type="checkbox"/> No |
| VIII. Facility Owner Information | | | | | | | | | | | | | |
| A. Name | | | | | | | | | | Phone Number (area code and number) | | | |
| Matthew S. McCormick, Operator/Facility-Property Owner | | | | | | | | | | (509) 376-7395 | | | |
| Street or P.O. Box | | | | | | | | | | | | | |
| P.O. Box 550 | | | | | | | | | | | | | |
| City or Town | | | | | | State | | ZIP Code | | | | | |
| Richland | | | | | | WA | | 99352 | | | | | |
| B. Owner Type | | F | | | | | | | | | | | |
| C. Does the name in VIII.A reflect a proposed change in owner? | | | | | | <input type="checkbox"/> Yes | | <input checked="" type="checkbox"/> No | | | | | |
| If yes, provide the scheduled date for the change: | | | | | | Month | | Day | | | Year | | |
| | | | | | | | | | | | | | |
| IX. NAICS Codes (5/6 digit codes) | | | | | | | | | | | | | |
| A. First | | | | | | B. Second | | | | | | | |
| 5 | | 6 | 2 | 2 | 1 | Waste Treatment & Disposal | 9 | 2 | 4 | 1 | 1 | 0 | Administration of Air & Water Resource & Solid Waste Management Programs |
| C. Third | | | | | | D. Fourth | | | | | | | |
| 5 | | 4 | 1 | 7 | 1 | Research & Development in the Physical, Engineering, & Life Sciences | | | | | | | |

| X. Other Environmental Permits (see instructions) | | | | | | | | | | | | | | | |
|--|--|--|-------------------------|---|---|----|---|---|---|----|---|---|---|-----------------------|---|
| A. Permit Type | | | B. Permit Number | | | | | | | | | | | C. Description | |
| E | | | T | S | C | A | 0 | 3 | - | 1 | 0 | - | 2 | 2 | TSCA approval, 40 CFR 761 |
| E | | | W | C | M | -1 | 2 | 7 | | | | | | | 40 CFR 761.61(c), TSCA risk-based approval 2003-10-22 |
| E | | | N | O | C | -9 | 3 | - | 3 | | | | | | WAC 173-400, General Regulations for Air Pollution Sources/WAC 173-460, Controls for New Sources of Toxic Air Pollutants |
| E | | | N | O | C | -9 | 6 | N | W | -1 | - | 3 | 0 | 1 | WAC 173-400, General Regulations for Air Pollution Sources/ WAC 173-460, Controls for New Sources of Toxic Air Pollutants |
| E | | | A | I | R | -0 | 4 | - | 1 | 0 | 1 | | | | WAC 246-247, Radiation Protection -- Air Emissions |
| U | | | S | T | | 4 | 5 | 0 | 0 | | | | | | WAC 173-216, State Waste Discharge Permit Program, Sitewide Permit for miscellaneous streams |
| U | | | S | T | | 4 | 5 | 1 | 1 | | | | | | WAC 173-216, State Waste Discharge Permit Program, Sitewide Permit for miscellaneous streams |

XI. Nature of Business (provide a brief description that includes both dangerous waste and non-dangerous waste areas and activities)

Construction of the Liquid Effluent Retention Facility (LERF) began in 1990. Waste management operations began at LERF in April 1994. Construction of the 200 Area Effluent Treatment Facility (ETF) began in 1992. Waste management operations began at ETF in November of 1995.

The LERF and ETF comprise an aqueous waste treatment system located in the 200 East Area that provides storage and treatment for a variety of aqueous mixed waste. This aqueous waste includes process condensate from the 242-A Evaporator 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 ETF for treatment in a series of process units, or systems, that remove or destroy 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 (ST4500) and the Final Delisting (40 CFR 261, Appendix IX, Table 2)

Sludge that accumulates in the bottoms of ETF process tanks is removed periodically and placed into containers. The waste is solidified by decanting the supernate from the container and the remainder of the liquid is allowed to evaporate, or absorbents are added, as necessary, to address the residual liquid. The process design capacity for treatment of waste in containers (T04) is 18,927 liters per day.

EXAMPLE FOR COMPLETING ITEMS XII and XIII (shown in lines numbered X-1, X-2, and X-3 below): A facility has two storage tanks that hold 1200 gallons and 400 gallons respectively. There is also treatment in tanks at 20 gallons/hr. Finally, a one-quarter acre area that is two meters deep will undergo *in situ* vitrification.

| Section XII. Process Codes and Design Capacities | | | | | | | | Section XIII. Other Process Codes | | | | | | | |
|--|-------------------------------|---|---|----------------------------|---------------------------------|----------------------------------|-------------|-----------------------------------|---|---|----------------------------|---------------------------------|----------------------------------|------------------------|--|
| Line Number | A. Process Codes (enter code) | | | B. Process Design Capacity | | C. Process Total Number of Units | Line Number | A. Process Codes (enter code) | | | B. Process Design Capacity | | C. Process Total Number of Units | D. Process Description | |
| | | | | 1. Amount | 2. Unit of Measure (enter code) | | | | | | 1. Amount | 2. Unit of Measure (enter code) | | | |
| X 1 | S | 0 | 2 | 1,600 | G | 002 | X 1 | T | 0 | 4 | 700 | C | 001 | In situ vitrification | |
| X 2 | T | 0 | 3 | 20 | E | 001 | | | | | | | | | |
| X 3 | T | 0 | 4 | 700 | C | 001 | | | | | | | | | |
| 1 | S | 0 | 4 | 88,500,000 | L | 003 | 1 | T | 0 | 4 | 18,927 | V | 001 | container treatment | |
| 2 | T | 0 | 2 | 88,500,000 | V | 003 | 2 | | | | | | | | |
| 3 | S | 0 | 2 | 9,849,350 | L | 019 | 3 | | | | | | | | |
| 4 | T | 0 | 1 | 817,646 | V | 017 | 4 | | | | | | | | |
| 5 | S | 0 | 1 | 147,630 | L | 003 | 5 | | | | | | | | |
| 6 | T | 0 | 4 | 18,927 | V | 001 | 6 | | | | | | | | |
| 7 | | | | | | | 7 | | | | | | | | |
| 8 | | | | | | | 8 | | | | | | | | |
| 9 | | | | | | | 9 | | | | | | | | |
| 1 0 | | | | | | | 1 0 | | | | | | | | |
| 1 1 | | | | | | | 1 1 | | | | | | | | |
| 1 2 | | | | | | | 1 2 | | | | | | | | |
| 1 3 | | | | | | | 1 3 | | | | | | | | |
| 1 4 | | | | | | | 1 4 | | | | | | | | |
| 1 5 | | | | | | | 1 5 | | | | | | | | |
| 1 6 | | | | | | | 1 6 | | | | | | | | |
| 1 7 | | | | | | | 1 7 | | | | | | | | |
| 1 8 | | | | | | | 1 8 | | | | | | | | |
| 1 9 | | | | | | | 1 9 | | | | | | | | |
| 2 0 | | | | | | | 2 0 | | | | | | | | |
| 2 1 | | | | | | | 2 1 | | | | | | | | |
| 2 2 | | | | | | | 2 2 | | | | | | | | |
| 2 3 | | | | | | | 2 3 | | | | | | | | |
| 2 4 | | | | | | | 2 4 | | | | | | | | |
| 2 5 | | | | | | | 2 5 | | | | | | | | |

XIV. Description of Dangerous Wastes

Example for completing this section: A facility will receive three non-listed wastes, then store and treat them on-site. Two wastes are corrosive only, with the facility receiving and storing the wastes in containers. There will be about 200 pounds per year of each of these two wastes, which will be neutralized in a tank. The other waste is corrosive and ignitable and will be neutralized then blended into hazardous waste fuel. There will be about 100 pounds per year of that waste, which will be received in bulk and put into tanks.

| Line Number | A. Dangerous Waste No. (enter code) | | | | B. Estimated Annual Quantity of Waste | C. Unit of Measure (enter code) | D. Processes | | | | | | | | | | | |
|-------------|-------------------------------------|---|---|---|---------------------------------------|---------------------------------|---|---|---|---|---|---|--|--|--|--|--|---------------------|
| | (1) Process Codes (enter) | | | | | | (2) Process Description [If a code is not entered in D (1)] | | | | | | | | | | | |
| X 1 | D | 0 | 0 | 2 | 400 | P | S | 0 | 1 | T | 0 | 1 | | | | | | |
| X 2 | D | 0 | 0 | 1 | 100 | P | S | 0 | 2 | T | 0 | 1 | | | | | | |
| X 3 | D | 0 | 0 | 2 | | | | | | | | | | | | | | Included with above |
| 1 | D | 0 | 0 | 1 | 106,940,410 | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 2 | D | 0 | 0 | 2 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 3 | D | 0 | 0 | 3 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 4 | D | 0 | 0 | 4 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 5 | D | 0 | 0 | 5 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 6 | D | 0 | 0 | 6 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 7 | D | 0 | 0 | 7 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 8 | D | 0 | 0 | 8 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 9 | D | 0 | 0 | 9 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 10 | D | 0 | 1 | 0 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 11 | D | 0 | 1 | 1 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 12 | D | 0 | 1 | 8 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 13 | D | 0 | 1 | 9 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 14 | D | 0 | 2 | 2 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 15 | D | 0 | 2 | 8 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 16 | D | 0 | 2 | 9 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 17 | D | 0 | 3 | 0 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 18 | D | 0 | 3 | 3 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 19 | D | 0 | 3 | 4 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 20 | D | 0 | 3 | 5 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 21 | D | 0 | 3 | 6 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 22 | D | 0 | 3 | 8 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 23 | D | 0 | 3 | 9 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 24 | D | 0 | 4 | 0 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 25 | D | 0 | 4 | 1 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |

| | | | | | | | | | | | | |
|----------------------------|---|---|---|---|---|---|---|---|---|---|---|---|
| EPA/State ID Number | W | A | 7 | 8 | 9 | 0 | 0 | 0 | 8 | 9 | 6 | 7 |
|----------------------------|---|---|---|---|---|---|---|---|---|---|---|---|

Continuation of Section XIV. Description of Dangerous Waste

| Line Number | A. Dangerous Waste No. (enter code) | | | | B. Estimated Annual Quantity of Waste | C. Unit of Measure (enter code) | D. Process | | | | | | | | |
|-------------|-------------------------------------|---|---|---|---------------------------------------|---------------------------------|---------------------------|---|---|---|---|---|--|--|--|
| | | | | | | | (1) Process Codes (enter) | | | | (2) Process Description [If a code is not entered in D (1)] | | | | |
| 26 | D | 0 | 4 | 3 | | K | S | 0 | 4 | T | 0 | 2 | | | |
| 27 | F | 0 | 0 | 1 | | K | S | 0 | 4 | T | 0 | 2 | | | |
| 28 | F | 0 | 0 | 2 | | K | S | 0 | 4 | T | 0 | 2 | | | |
| 29 | F | 0 | 0 | 3 | | K | S | 0 | 4 | T | 0 | 2 | | | |
| 30 | F | 0 | 0 | 4 | | K | S | 0 | 4 | T | 0 | 2 | | | |
| 31 | F | 0 | 0 | 5 | | K | S | 0 | 4 | T | 0 | 2 | | | |
| 32 | F | 0 | 3 | 9 | | K | S | 0 | 4 | T | 0 | 2 | | | |
| 33 | W | T | 0 | 1 | | K | S | 0 | 4 | T | 0 | 2 | | | |
| 34 | W | T | 0 | 2 | | K | S | 0 | 4 | T | 0 | 2 | | | |
| 35 | U | 2 | 1 | 0 | | K | S | 0 | 4 | T | 0 | 2 | | | |
| 36 | D | 0 | 0 | 1 | 106,940,410 | K | T | 0 | 1 | | | | | | |
| 37 | D | 0 | 0 | 2 | | K | T | 0 | 1 | | | | | | |
| 38 | D | 0 | 0 | 3 | | K | T | 0 | 1 | | | | | | |
| 39 | D | 0 | 0 | 4 | | K | T | 0 | 1 | | | | | | |
| 40 | D | 0 | 0 | 5 | | K | T | 0 | 1 | | | | | | |
| 41 | D | 0 | 0 | 6 | | K | T | 0 | 1 | | | | | | |
| 42 | D | 0 | 0 | 7 | | K | T | 0 | 1 | | | | | | |
| 43 | D | 0 | 0 | 8 | | K | T | 0 | 1 | | | | | | |
| 44 | D | 0 | 0 | 9 | | K | T | 0 | 1 | | | | | | |
| 45 | D | 0 | 1 | 0 | | K | T | 0 | 1 | | | | | | |
| 46 | D | 0 | 1 | 1 | | K | T | 0 | 1 | | | | | | |
| 47 | D | 0 | 1 | 8 | | K | T | 0 | 1 | | | | | | |
| 48 | D | 0 | 1 | 9 | | K | T | 0 | 1 | | | | | | |
| 49 | D | 0 | 2 | 2 | | K | T | 0 | 1 | | | | | | |
| 50 | D | 0 | 2 | 8 | | K | T | 0 | 1 | | | | | | |
| 51 | D | 0 | 2 | 9 | | K | T | 0 | 1 | | | | | | |
| 52 | D | 0 | 3 | 0 | | K | T | 0 | 1 | | | | | | |
| 53 | D | 0 | 3 | 3 | | K | T | 0 | 1 | | | | | | |
| 54 | D | 0 | 3 | 4 | | K | T | 0 | 1 | | | | | | |
| 55 | D | 0 | 3 | 5 | | K | T | 0 | 1 | | | | | | |

| | | | | | | | | | | | | |
|----------------------------|---|---|---|---|---|---|---|---|---|---|---|---|
| EPA/State ID Number | W | A | 7 | 8 | 9 | 0 | 0 | 0 | 8 | 9 | 6 | 7 |
|----------------------------|---|---|---|---|---|---|---|---|---|---|---|---|

Continuation of Section XIV. Description of Dangerous Waste

| Line Number | A. Dangerous Waste No. (enter code) | | | | B. Estimated Annual Quantity of Waste | C. Unit of Measure (enter code) | D. Process | | | | | | | | | | |
|-------------|-------------------------------------|---|---|---|---------------------------------------|---------------------------------|---------------------------|---|---|--|--|--|--|---|--|--|--|
| | | | | | | | (1) Process Codes (enter) | | | | | | | (2) Process Description [If a code is not entered in D (1)] | | | |
| 56 | D | 0 | 3 | 6 | | K | T | 0 | 1 | | | | | | | | |
| 57 | D | 0 | 3 | 8 | | K | T | 0 | 1 | | | | | | | | |
| 58 | D | 0 | 3 | 9 | | K | T | 0 | 1 | | | | | | | | |
| 59 | D | 0 | 4 | 0 | | K | T | 0 | 1 | | | | | | | | |
| 60 | D | 0 | 4 | 1 | | K | T | 0 | 1 | | | | | | | | |
| 61 | D | 0 | 4 | 3 | | K | T | 0 | 1 | | | | | | | | |
| 62 | F | 0 | 0 | 1 | | K | T | 0 | 1 | | | | | | | | |
| 63 | F | 0 | 0 | 2 | | K | T | 0 | 1 | | | | | | | | |
| 64 | F | 0 | 0 | 3 | | K | T | 0 | 1 | | | | | | | | |
| 65 | F | 0 | 0 | 4 | | K | T | 0 | 1 | | | | | | | | |
| 66 | F | 0 | 0 | 5 | | K | T | 0 | 1 | | | | | | | | |
| 67 | F | 0 | 3 | 9 | | K | T | 0 | 1 | | | | | | | | |
| 68 | W | T | 0 | 1 | | K | T | 0 | 1 | | | | | | | | |
| 69 | W | T | 0 | 2 | | K | T | 0 | 1 | | | | | | | | |
| 70 | U | 2 | 1 | 0 | | K | T | 0 | 1 | | | | | | | | |
| 71 | D | 0 | 0 | 1 | 106,940,410 | K | S | 0 | 2 | | | | | | | | |
| 72 | D | 0 | 0 | 2 | | K | S | 0 | 2 | | | | | | | | |
| 73 | D | 0 | 0 | 3 | | K | S | 0 | 2 | | | | | | | | |
| 74 | D | 0 | 0 | 4 | | K | S | 0 | 2 | | | | | | | | |
| 75 | D | 0 | 0 | 5 | | K | S | 0 | 2 | | | | | | | | |
| 76 | D | 0 | 0 | 6 | | K | S | 0 | 2 | | | | | | | | |
| 77 | D | 0 | 0 | 7 | | K | S | 0 | 2 | | | | | | | | |
| 78 | D | 0 | 0 | 8 | | K | S | 0 | 2 | | | | | | | | |
| 79 | D | 0 | 0 | 9 | | K | S | 0 | 2 | | | | | | | | |
| 80 | D | 0 | 1 | 0 | | K | S | 0 | 2 | | | | | | | | |
| 81 | D | 0 | 1 | 1 | | K | S | 0 | 2 | | | | | | | | |
| 82 | D | 0 | 1 | 8 | | K | S | 0 | 2 | | | | | | | | |
| 83 | D | 0 | 1 | 9 | | K | S | 0 | 2 | | | | | | | | |
| 84 | D | 0 | 2 | 2 | | K | S | 0 | 2 | | | | | | | | |
| 85 | D | 0 | 2 | 8 | | K | S | 0 | 2 | | | | | | | | |

| | | | | | | | | | | | | |
|----------------------------|---|---|---|---|---|---|---|---|---|---|---|---|
| EPA/State ID Number | W | A | 7 | 8 | 9 | 0 | 0 | 0 | 8 | 9 | 6 | 7 |
|----------------------------|---|---|---|---|---|---|---|---|---|---|---|---|

Continuation of Section XIV. Description of Dangerous Waste

| Line Number | A. Dangerous Waste No. (enter code) | | | | B. Estimated Annual Quantity of Waste | C. Unit of Measure (enter code) | D. Process | | | | | | | | | | |
|-------------|-------------------------------------|---|---|---|---------------------------------------|---------------------------------|------------|---|---|--|--|--|--|--|--|--|-----------------|
| | (1) Process Codes (enter) | | | | | | | (2) Process Description [If a code is not entered in D (1)] | | | | | | | | | |
| 86 | D | 0 | 2 | 9 | | K | S | 0 | 2 | | | | | | | | |
| 87 | D | 0 | 3 | 0 | | K | S | 0 | 2 | | | | | | | | |
| 88 | D | 0 | 3 | 3 | | K | S | 0 | 2 | | | | | | | | |
| 89 | D | 0 | 3 | 4 | | K | S | 0 | 2 | | | | | | | | |
| 90 | D | 0 | 3 | 5 | | K | S | 0 | 2 | | | | | | | | |
| 91 | D | 0 | 3 | 6 | | K | S | 0 | 2 | | | | | | | | |
| 92 | D | 0 | 3 | 8 | | K | S | 0 | 2 | | | | | | | | |
| 93 | D | 0 | 3 | 9 | | K | S | 0 | 2 | | | | | | | | |
| 94 | D | 0 | 4 | 0 | | K | S | 0 | 2 | | | | | | | | |
| 95 | D | 0 | 4 | 1 | | K | S | 0 | 2 | | | | | | | | |
| 96 | D | 0 | 4 | 3 | | K | S | 0 | 2 | | | | | | | | |
| 97 | F | 0 | 0 | 1 | | K | S | 0 | 2 | | | | | | | | |
| 98 | F | 0 | 0 | 2 | | K | S | 0 | 2 | | | | | | | | |
| 99 | F | 0 | 0 | 3 | | K | S | 0 | 2 | | | | | | | | |
| 100 | F | 0 | 0 | 4 | | K | S | 0 | 2 | | | | | | | | |
| 101 | F | 0 | 0 | 5 | | K | S | 0 | 2 | | | | | | | | |
| 102 | F | 0 | 3 | 9 | | K | S | 0 | 2 | | | | | | | | |
| 103 | W | T | 0 | 1 | | K | S | 0 | 2 | | | | | | | | |
| 104 | W | T | 0 | 2 | | K | S | 0 | 2 | | | | | | | | |
| 105 | U | 2 | 1 | 0 | | K | S | 0 | 2 | | | | | | | | |
| 106 | D | 0 | 0 | 1 | 153,932 | K | S | 0 | 1 | | | | | | | | Includes Debris |
| 107 | D | 0 | 0 | 2 | | K | S | 0 | 1 | | | | | | | | Includes Debris |
| 108 | D | 0 | 0 | 3 | | K | S | 0 | 1 | | | | | | | | Includes Debris |
| 109 | D | 0 | 0 | 4 | | K | S | 0 | 1 | | | | | | | | Includes Debris |
| 110 | D | 0 | 0 | 5 | | K | S | 0 | 1 | | | | | | | | Includes Debris |
| 111 | D | 0 | 0 | 6 | | K | S | 0 | 1 | | | | | | | | Includes Debris |
| 112 | D | 0 | 0 | 7 | | K | S | 0 | 1 | | | | | | | | Includes Debris |
| 113 | D | 0 | 0 | 8 | | K | S | 0 | 1 | | | | | | | | Includes Debris |
| 114 | D | 0 | 0 | 9 | | K | S | 0 | 1 | | | | | | | | Includes Debris |
| 115 | D | 0 | 1 | 0 | | K | S | 0 | 1 | | | | | | | | Includes Debris |
| 116 | D | 0 | 1 | 1 | | K | S | 0 | 1 | | | | | | | | Includes Debris |

| | | | | | | | | | | | | |
|----------------------------|---|---|---|---|---|---|---|---|---|---|---|---|
| EPA/State ID Number | W | A | 7 | 8 | 9 | 0 | 0 | 0 | 8 | 9 | 6 | 7 |
|----------------------------|---|---|---|---|---|---|---|---|---|---|---|---|

Continuation of Section XIV. Description of Dangerous Waste

| Line Number | A. Dangerous Waste No. (enter code) | B. Estimated Annual Quantity of Waste | C. Unit of Measure (enter code) | D. Process | | | | | | | | | | |
|-------------|-------------------------------------|---------------------------------------|---------------------------------|---------------------------|--|--|--|--|---|--|--|--|--|--|
| | | | | (1) Process Codes (enter) | | | | | (2) Process Description [If a code is not entered in D (1)] | | | | | |
| 181 | | | | | | | | | | | | | | |
| 182 | | | | | | | | | | | | | | |
| 183 | | | | | | | | | | | | | | |
| 184 | | | | | | | | | | | | | | |

| |
|--|
| <p>XV. Map</p> <p>Attach to this application a topographic map of the area extending to at least one (1) mile beyond property boundaries. The map must show the outline of the facility; the location of each of its existing and proposed intake and discharge structures; each of its dangerous waste treatment, storage, recycling, or disposal units; and each well where fluids are injected underground. Include all springs, rivers, and other surface water bodies in this map area, plus drinking water wells listed in public records or otherwise known to the applicant within ¼ mile of the facility property boundary. The instructions provide additional information on meeting these requirements.</p> |
| <p>Topographic map is located in the Ecology Library</p> |
| <p>XVI. Facility Drawing</p> <p>All existing facilities must include a scale drawing of the facility (refer to Instructions for more detail).</p> |
| <p>XVII. Photographs</p> <p>All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, recycling, and disposal areas; and sites of future storage, treatment, recycling, or disposal areas (refer to Instructions for more detail).</p> |

| | | |
|--|-------------------------|---------------------------|
| <p>XVIII. Certifications</p> <p>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p> | | |
| <p>Operator Name and Official Title (type or print) Matthew S. McCormick, Manager U.S. Department of Energy Richland Operations Office</p> | <p>Signature</p> | <p>Date Signed</p> |
| <p>Co-Operator* Name and Official Title (type or print) John C. Fulton President and Chief Executive Officer CH2M HILL Plateau Remediation Company</p> | <p>Signature</p> | <p>Date Signed</p> |
| <p>Co-Operator – Address and Telephone Number* P.O. Box 1600 Richland, WA 99352 (509) 376-0556</p> | | |
| <p>Facility-Property Owner Name and Official Title (type or print) Matthew S. McCormick, Manager U.S. Department of Energy Richland Operations Office</p> | <p>Signature</p> | <p>Date Signed</p> |

Comments

Section XII. Process Codes and Design Capacities – B.1. Amount, changed 7,608,654 L to 9,849,350 L for S02.

Section XIV. Description of Dangerous Waste – B. Estimated Annual Quantity of Waste, changed 88,497,000 K to 106,940,410 K for S04T02 on line numbers 1 through 35; 298,434,296 K to 106,940,410 K for T01 on line numbers 36 through 70; 30,433,326 K to 106,940,410 K for S02 on line numbers 71 through 105; and 1,986,735 K to 153,932 K for S01 on line numbers 106 through 140.

Section XVIII. Certifications – for Co-Operator “John G. Lehew III” to “John C. Fulton”.

Photographs. Added photograph of LERF and 200 Area ETF.

Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility



Liquid Effluent Retention Facility



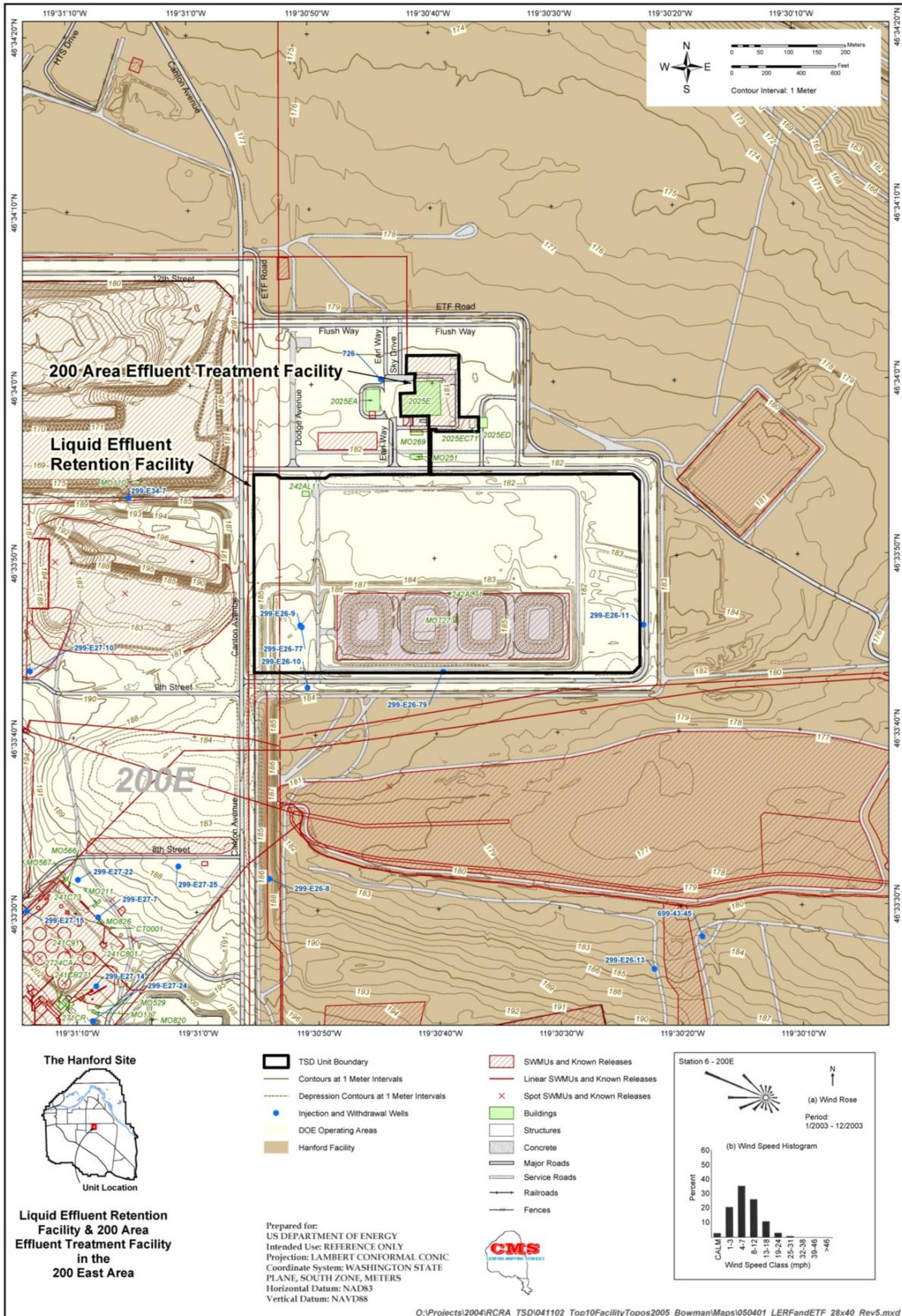
Typical Basin

Photo Taken 1992

200 Area Effluent Treatment Facility



Photo Taken 2005



| | | | | | | | | | | | | | | | | | |
|---|---|--|--------------|---|---------------------------------|---|---|-------|---|-------|--------|----------|---|--|---|---|---|
|  WASHINGTON STATE DEPARTMENT OF E C O L O G Y | | Addendum A Part A Form | | | | | | | | | | | | | | | |
| Date Received | | | Reviewed by: | | | | | Date: | | | | | | | | | |
| Month | Day | Year | Approved by: | | | | | Date: | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |
| I. This form is submitted to: (place an "X" in the appropriate box) | | | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> | Request modification to a final status permit (commonly called a "Part B" permit) | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> | Request a change under interim status | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> | Apply for a final status permit. This includes the application for the initial final status permit for a site or for a permit renewal (i.e., a new permit to replace an expiring permit). | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> | Establish interim status because of the wastes newly regulated on: | | | | | | | | | | (Date) | | | | | | |
| List waste codes: | | | | | | | | | | | | | | | | | |
| II. EPA/State ID Number | | | | | | | | | | | | | | | | | |
| W | A | 7 | 8 | 9 | 0 | 0 | 0 | 8 | 9 | 6 | 7 | | | | | | |
| III. Name of Facility | | | | | | | | | | | | | | | | | |
| US Department of Energy – Hanford Facility | | | | | | | | | | | | | | | | | |
| IV. Facility Location (Physical address not P.O. Box or Route Number) | | | | | | | | | | | | | | | | | |
| A. Street | | | | | | | | | | | | | | | | | |
| 825 Jadwin | | | | | | | | | | | | | | | | | |
| City or Town | | | | | | | | | | State | | ZIP Code | | | | | |
| Richland | | | | | | | | | | WA | | 99352 | | | | | |
| County Code (if) | | County Name | | | | | | | | | | | | | | | |
| 0 | 0 | 5 | Benton | | | | | | | | | | | | | | |
| B. Land Type | C. Geographic Location Latitude (degrees, mins, secs) | | | | Longitude (degrees, mins, secs) | | | | D. Facility Existence Date Month Day Year | | | | | | | | |
| | F Refer to TOPO Map (Section XV.) | | | | | | | | 0 | 3 | | 0 | 2 | | 1 | 9 | 4 |
| V. Facility Mailing Address | | | | | | | | | | | | | | | | | |
| Street or P.O. Box | | | | | | | | | | | | | | | | | |
| P.O. Box 550 | | | | | | | | | | | | | | | | | |
| City or Town | | | | | | | | | | State | | ZIP Code | | | | | |
| Richland | | | | | | | | | | WA | | 99352 | | | | | |

| VI. Facility contact (Person to be contacted regarding waste activities at facility) | | | | | | | | | | | | | |
|--|---|---|-----|---|--|--|---|----------|-------------------------------------|------------------------------|---|--|--|
| Name (last) | | | | | | (first) | | | | | | | |
| McCormick | | | | | | Matthew | | | | | | | |
| Job Title | | | | | | Phone Number (area code and number) | | | | | | | |
| Manager | | | | | | (509) 376-7395 | | | | | | | |
| Contact Address | | | | | | | | | | | | | |
| Street or P.O. Box | | | | | | | | | | | | | |
| P.O. Box 550 | | | | | | | | | | | | | |
| City or Town | | | | | | State | | ZIP Code | | | | | |
| Richland | | | | | | WA | | 99352 | | | | | |
| VII. Facility Operator Information | | | | | | | | | | | | | |
| A. Name | | | | | | | | | Phone Number | | | | |
| Department of Energy Owner/Operator CH2M HILL Plateau Remediation Company Co-Operator for LERF & 200 Area ETF* | | | | | | | | | (509) 376-7395 (509) 376-0556* | | | | |
| Street or P.O. Box | | | | | | | | | | | | | |
| P.O. Box 550 P.O. Box 1600 * | | | | | | | | | | | | | |
| City or Town | | | | | | State | | ZIP Code | | | | | |
| Richland | | | | | | WA | | 99352 | | | | | |
| B. Operator Type | | F | | | | | | | | | | | |
| C. Does the name in VII.A reflect a proposed change in operator? If yes, provide the scheduled date for the change: | | | | | | | | | | <input type="checkbox"/> Yes | | <input checked="" type="checkbox"/> No | Co-Operator* change |
| Month | | | Day | | | Year | | | | | | | |
| 1 | 0 | | 0 | 1 | | 2 | 0 | 0 | 8 | | | | |
| D. Is the name listed in VII.A. also the owner? If yes, skip to Section VIII.C. | | | | | | | | | | <input type="checkbox"/> Yes | | <input checked="" type="checkbox"/> No | |
| VIII. Facility Owner Information | | | | | | | | | | | | | |
| A. Name | | | | | | | | | Phone Number (area code and number) | | | | |
| Matthew S. McCormick, Operator/Facility-Property Owner | | | | | | | | | (509) 376-7395 | | | | |
| Street or P.O. Box | | | | | | | | | | | | | |
| P.O. Box 550 | | | | | | | | | | | | | |
| City or Town | | | | | | State | | ZIP Code | | | | | |
| Richland | | | | | | WA | | 99352 | | | | | |
| B. Owner Type | | F | | | | | | | | | | | |
| C. Does the name in VIII.A reflect a proposed change in owner? If yes, provide the scheduled date for the change: | | | | | | | | | | <input type="checkbox"/> Yes | | <input checked="" type="checkbox"/> No | |
| Month | | | Day | | | Year | | | | | | | |
| | | | | | | | | | | | | | |
| IX. NAICS Codes (5/6 digit codes) | | | | | | | | | | | | | |
| A. First | | | | | | B. Second | | | | | | | |
| 5 | 6 | 2 | 2 | 1 | | Waste Treatment & Disposal | 9 | 2 | 4 | 1 | 1 | 0 | Administration of Air & Water Resource & Solid Waste Management Programs |
| C. Third | | | | | | D. Fourth | | | | | | | |
| 5 | 4 | 1 | 7 | 1 | | Research & Development in the Physical, Engineering, & Life Sciences | | | | | | | |

| X. Other Environmental Permits (see instructions) | | | | | | | | | | | | | | |
|---|--|------------------|---|---|----|---|---|---|----|---|---|---|----------------|---|
| A. Permit Type | | B. Permit Number | | | | | | | | | | | C. Description | |
| E | | T | S | C | A | 0 | 3 | - | 1 | 0 | - | 2 | 2 | TSCA approval, 40 CFR 761 |
| E | | W | C | M | -1 | 2 | 7 | | | | | | | 40 CFR 761.61(c), TSCA risk-based approval 2003-10-22 |
| E | | N | O | C | -9 | 3 | - | 3 | | | | | | WAC 173-400, General Regulations for Air Pollution Sources/WAC 173-460, Controls for New Sources of Toxic Air Pollutants |
| E | | N | O | C | -9 | 6 | N | W | -1 | - | 3 | 0 | 1 | WAC 173-400, General Regulations for Air Pollution Sources/ WAC 173-460, Controls for New Sources of Toxic Air Pollutants |
| E | | A | I | R | -0 | 4 | - | 1 | 0 | 1 | | | | WAC 246-247, Radiation Protection -- Air Emissions |
| U | | S | T | | 4 | 5 | 0 | 0 | | | | | | WAC 173-216, State Waste Discharge Permit Program, Sitewide Permit for miscellaneous streams |
| U | | S | T | | 4 | 5 | 1 | 1 | | | | | | WAC 173-216, State Waste Discharge Permit Program, Sitewide Permit for miscellaneous streams |

XI. Nature of Business (provide a brief description that includes both dangerous waste and non-dangerous waste areas and activities)

Construction of the Liquid Effluent Retention Facility (LERF) began in 1990. Waste management operations began at LERF in April 1994. Construction of the 200 Area Effluent Treatment Facility (ETF) began in 1992. Waste management operations began at ETF in November of 1995.

The LERF and ETF comprise an aqueous waste treatment system located in the 200 East Area that provides storage and treatment for a variety of aqueous mixed waste. This aqueous waste includes process condensate from the 242-A Evaporator 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 ETF for treatment in a series of process units, or systems, that remove or destroy 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 (ST4500) and the Final Delisting (40 CFR 261, Appendix IX, Table 2)

Sludge that accumulates in the bottoms of ETF process tanks is removed periodically and placed into containers. The waste is solidified by decanting the supernate from the container and the remainder of the liquid is allowed to evaporate, or absorbents are added, as necessary, to address the residual liquid. The process design capacity for treatment of waste in containers (T04) is 18,927 liters per day.

EXAMPLE FOR COMPLETING ITEMS XII and XIII (shown in lines numbered X-1, X-2, and X-3 below): A facility has two storage tanks that hold 1200 gallons and 400 gallons respectively. There is also treatment in tanks at 20 gallons/hr. Finally, a one-quarter acre area that is two meters deep will undergo *in situ vitrification*.

| Section XII. Process Codes and Design Capacities | | | | | | | | Section XIII. Other Process Codes | | | | | | | |
|--|-------------------------------|---|---|-----------------------------------|---------------------------------|----------------------------------|-------------|-----------------------------------|---|---|----------------------------|---------------------------------|----------------------------------|------------------------|--|
| Line Number | A. Process Codes (enter code) | | | B. Process Design Capacity | | C. Process Total Number of Units | Line Number | A. Process Codes (enter code) | | | B. Process Design Capacity | | C. Process Total Number of Units | D. Process Description | |
| | | | | 1. Amount | 2. Unit of Measure (enter code) | | | | | | 1. Amount | 2. Unit of Measure (enter code) | | | |
| X 1 | S | 0 | 2 | 1,600 | G | 002 | X 1 | T | 0 | 4 | 700 | C | 001 | In situ vitrification | |
| X 2 | T | 0 | 3 | 20 | E | 001 | | | | | | | | | |
| X 3 | T | 0 | 4 | 700 | C | 001 | | | | | | | | | |
| 1 | S | 0 | 4 | 88,500,000 | L | 003 | 1 | T | 0 | 4 | 18,927 | V | 001 | container treatment | |
| 2 | T | 0 | 2 | 88,500,000 | V | 003 | 2 | | | | | | | | |
| 3 | S | 0 | 2 | 9,652,810 9,849,350 | L | 019 | 3 | | | | | | | | |
| 4 | T | 0 | 1 | 817,646 | V | 017 | 4 | | | | | | | | |
| 5 | S | 0 | 1 | 147,630 | L | 003 | 5 | | | | | | | | |
| 6 | T | 0 | 4 | 18,927 | V | 001 | 6 | | | | | | | | |
| 7 | | | | | | | 7 | | | | | | | | |
| 8 | | | | | | | 8 | | | | | | | | |
| 9 | | | | | | | 9 | | | | | | | | |
| 1 0 | | | | | | | 1 0 | | | | | | | | |
| 1 1 | | | | | | | 1 1 | | | | | | | | |
| 1 2 | | | | | | | 1 2 | | | | | | | | |
| 1 3 | | | | | | | 1 3 | | | | | | | | |
| 1 4 | | | | | | | 1 4 | | | | | | | | |
| 1 5 | | | | | | | 1 5 | | | | | | | | |
| 1 6 | | | | | | | 1 6 | | | | | | | | |
| 1 7 | | | | | | | 1 7 | | | | | | | | |
| 1 8 | | | | | | | 1 8 | | | | | | | | |
| 1 9 | | | | | | | 1 9 | | | | | | | | |
| 2 0 | | | | | | | 2 0 | | | | | | | | |
| 2 1 | | | | | | | 2 1 | | | | | | | | |
| 2 2 | | | | | | | 2 2 | | | | | | | | |
| 2 3 | | | | | | | 2 3 | | | | | | | | |
| 2 4 | | | | | | | 2 4 | | | | | | | | |
| 2 5 | | | | | | | 2 5 | | | | | | | | |

| XIV. Description of Dangerous Wastes | | | | | | | | | | | | | | |
|---|-------------------------------------|---|---|---|---------------------------------------|---------------------------------|---------------------------|---|---|---|---|---|--|---------------------|
| Example for completing this section: A facility will receive three non-listed wastes, then store and treat them on-site. Two wastes are corrosive only, with the facility receiving and storing the wastes in containers. There will be about 200 pounds per year of each of these two wastes, which will be neutralized in a tank. The other waste is corrosive and ignitable and will be neutralized then blended into hazardous waste fuel. There will be about 100 pounds per year of that waste, which will be received in bulk and put into tanks. | | | | | | | | | | | | | | |
| Line Number | A. Dangerous Waste No. (enter code) | | | | B. Estimated Annual Quantity of Waste | C. Unit of Measure (enter code) | D. Processes | | | | | | | |
| | | | | | | | (1) Process Codes (enter) | | | | (2) Process Description [If a code is not entered in D (1)] | | | |
| X 1 | D | 0 | 0 | 2 | 400 | P | S | 0 | 1 | T | 0 | 1 | | |
| X 2 | D | 0 | 0 | 1 | 100 | P | S | 0 | 2 | T | 0 | 1 | | |
| X 3 | D | 0 | 0 | 2 | | | | | | | | | | Included with above |
| 1 | D | 0 | 0 | 1 | 106,940,4108 8,497,000 | K | S | 0 | 4 | T | 0 | 2 | | |
| 2 | D | 0 | 0 | 2 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 3 | D | 0 | 0 | 3 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 4 | D | 0 | 0 | 4 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 5 | D | 0 | 0 | 5 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 6 | D | 0 | 0 | 6 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 7 | D | 0 | 0 | 7 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 8 | D | 0 | 0 | 8 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 9 | D | 0 | 0 | 9 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 10 | D | 0 | 1 | 0 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 11 | D | 0 | 1 | 1 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 12 | D | 0 | 1 | 8 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 13 | D | 0 | 1 | 9 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 14 | D | 0 | 2 | 2 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 15 | D | 0 | 2 | 8 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 16 | D | 0 | 2 | 9 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 17 | D | 0 | 3 | 0 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 18 | D | 0 | 3 | 3 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 19 | D | 0 | 3 | 4 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 20 | D | 0 | 3 | 5 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 21 | D | 0 | 3 | 6 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 22 | D | 0 | 3 | 8 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 23 | D | 0 | 3 | 9 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 24 | D | 0 | 4 | 0 | | K | S | 0 | 4 | T | 0 | 2 | | |
| 25 | D | 0 | 4 | 1 | | K | S | 0 | 4 | T | 0 | 2 | | |

| | | | | | | | | | | | | |
|---------------------|---|---|---|---|---|---|---|---|---|---|---|---|
| EPA/State ID Number | W | A | 7 | 8 | 9 | 0 | 0 | 0 | 8 | 9 | 6 | 7 |
|---------------------|---|---|---|---|---|---|---|---|---|---|---|---|

Continuation of Section XIV. Description of Dangerous Waste

| Line Number | A. Dangerous Waste No. (enter code) | | | | B. Estimated Annual Quantity of Waste | C. Unit of Measure (enter code) | D. Process | | | | | | | | | | | |
|-------------|-------------------------------------|---|---|---|---------------------------------------|---------------------------------|---------------------------|---|---|---|---|---|--|--|--|--|--|--|
| | | | | | | | (1) Process Codes (enter) | | | | (2) Process Description [If a code is not entered in D (1)] | | | | | | | |
| 26 | D | 0 | 4 | 3 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 27 | F | 0 | 0 | 1 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 28 | F | 0 | 0 | 2 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 29 | F | 0 | 0 | 3 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 30 | F | 0 | 0 | 4 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 31 | F | 0 | 0 | 5 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 32 | F | 0 | 3 | 9 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 33 | W | T | 0 | 1 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 34 | W | T | 0 | 2 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 35 | U | 2 | 1 | 0 | | K | S | 0 | 4 | T | 0 | 2 | | | | | | |
| 36 | D | 0 | 0 | 1 | 106,940,4102 98,434,296 | K | T | 0 | 1 | | | | | | | | | |
| 37 | D | 0 | 0 | 2 | | K | T | 0 | 1 | | | | | | | | | |
| 38 | D | 0 | 0 | 3 | | K | T | 0 | 1 | | | | | | | | | |
| 39 | D | 0 | 0 | 4 | | K | T | 0 | 1 | | | | | | | | | |
| 40 | D | 0 | 0 | 5 | | K | T | 0 | 1 | | | | | | | | | |
| 41 | D | 0 | 0 | 6 | | K | T | 0 | 1 | | | | | | | | | |
| 42 | D | 0 | 0 | 7 | | K | T | 0 | 1 | | | | | | | | | |
| 43 | D | 0 | 0 | 8 | | K | T | 0 | 1 | | | | | | | | | |
| 44 | D | 0 | 0 | 9 | | K | T | 0 | 1 | | | | | | | | | |
| 45 | D | 0 | 1 | 0 | | K | T | 0 | 1 | | | | | | | | | |
| 46 | D | 0 | 1 | 1 | | K | T | 0 | 1 | | | | | | | | | |
| 47 | D | 0 | 1 | 8 | | K | T | 0 | 1 | | | | | | | | | |
| 48 | D | 0 | 1 | 9 | | K | T | 0 | 1 | | | | | | | | | |
| 49 | D | 0 | 2 | 2 | | K | T | 0 | 1 | | | | | | | | | |
| 50 | D | 0 | 2 | 8 | | K | T | 0 | 1 | | | | | | | | | |
| 51 | D | 0 | 2 | 9 | | K | T | 0 | 1 | | | | | | | | | |
| 52 | D | 0 | 3 | 0 | | K | T | 0 | 1 | | | | | | | | | |
| 53 | D | 0 | 3 | 3 | | K | T | 0 | 1 | | | | | | | | | |
| 54 | D | 0 | 3 | 4 | | K | T | 0 | 1 | | | | | | | | | |
| 55 | D | 0 | 3 | 5 | | K | T | 0 | 1 | | | | | | | | | |

| | | | | | | | | | | | | |
|---------------------|---|---|---|---|---|---|---|---|---|---|---|---|
| EPA/State ID Number | W | A | 7 | 8 | 9 | 0 | 0 | 0 | 8 | 9 | 6 | 7 |
|---------------------|---|---|---|---|---|---|---|---|---|---|---|---|

Continuation of Section XIV. Description of Dangerous Waste

| Line Number | A. Dangerous Waste No. (enter code) | | | | B. Estimated Annual Quantity of Waste | C. Unit of Measure (enter code) | D. Process | | | | | | | | | | | | | |
|-------------|-------------------------------------|---|---|---|---------------------------------------|---------------------------------|---------------------------|---|---|--|--|---|--|--|--|--|--|--|--|--|
| | | | | | | | (1) Process Codes (enter) | | | | | (2) Process Description [If a code is not entered in D (1)] | | | | | | | | |
| 56 | D | 0 | 3 | 6 | | K | T | 0 | 1 | | | | | | | | | | | |
| 57 | D | 0 | 3 | 8 | | K | T | 0 | 1 | | | | | | | | | | | |
| 58 | D | 0 | 3 | 9 | | K | T | 0 | 1 | | | | | | | | | | | |
| 59 | D | 0 | 4 | 0 | | K | T | 0 | 1 | | | | | | | | | | | |
| 60 | D | 0 | 4 | 1 | | K | T | 0 | 1 | | | | | | | | | | | |
| 61 | D | 0 | 4 | 3 | | K | T | 0 | 1 | | | | | | | | | | | |
| 62 | F | 0 | 0 | 1 | | K | T | 0 | 1 | | | | | | | | | | | |
| 63 | F | 0 | 0 | 2 | | K | T | 0 | 1 | | | | | | | | | | | |
| 64 | F | 0 | 0 | 3 | | K | T | 0 | 1 | | | | | | | | | | | |
| 65 | F | 0 | 0 | 4 | | K | T | 0 | 1 | | | | | | | | | | | |
| 66 | F | 0 | 0 | 5 | | K | T | 0 | 1 | | | | | | | | | | | |
| 67 | F | 0 | 3 | 9 | | K | T | 0 | 1 | | | | | | | | | | | |
| 68 | W | T | 0 | 1 | | K | T | 0 | 1 | | | | | | | | | | | |
| 69 | W | T | 0 | 2 | | K | T | 0 | 1 | | | | | | | | | | | |
| 70 | U | 2 | 1 | 0 | | K | T | 0 | 1 | | | | | | | | | | | |
| 71 | D | 0 | 0 | 1 | 106,940,4103 0,433,326 | K | S | 0 | 2 | | | | | | | | | | | |
| 72 | D | 0 | 0 | 2 | | K | S | 0 | 2 | | | | | | | | | | | |
| 73 | D | 0 | 0 | 3 | | K | S | 0 | 2 | | | | | | | | | | | |
| 74 | D | 0 | 0 | 4 | | K | S | 0 | 2 | | | | | | | | | | | |
| 75 | D | 0 | 0 | 5 | | K | S | 0 | 2 | | | | | | | | | | | |
| 76 | D | 0 | 0 | 6 | | K | S | 0 | 2 | | | | | | | | | | | |
| 77 | D | 0 | 0 | 7 | | K | S | 0 | 2 | | | | | | | | | | | |
| 78 | D | 0 | 0 | 8 | | K | S | 0 | 2 | | | | | | | | | | | |
| 79 | D | 0 | 0 | 9 | | K | S | 0 | 2 | | | | | | | | | | | |
| 80 | D | 0 | 1 | 0 | | K | S | 0 | 2 | | | | | | | | | | | |
| 81 | D | 0 | 1 | 1 | | K | S | 0 | 2 | | | | | | | | | | | |
| 82 | D | 0 | 1 | 8 | | K | S | 0 | 2 | | | | | | | | | | | |
| 83 | D | 0 | 1 | 9 | | K | S | 0 | 2 | | | | | | | | | | | |
| 84 | D | 0 | 2 | 2 | | K | S | 0 | 2 | | | | | | | | | | | |
| 85 | D | 0 | 2 | 8 | | K | S | 0 | 2 | | | | | | | | | | | |

| | | | | | | | | | | | | |
|---------------------|---|---|---|---|---|---|---|---|---|---|---|---|
| EPA/State ID Number | W | A | 7 | 8 | 9 | 0 | 0 | 0 | 8 | 9 | 6 | 7 |
|---------------------|---|---|---|---|---|---|---|---|---|---|---|---|

Continuation of Section XIV. Description of Dangerous Waste

| Line Number | A. Dangerous Waste No. (enter code) | | | | B. Estimated Annual Quantity of Waste | C. Unit of Measure (enter code) | D. Process | | | | | | | | | | | | | | |
|-------------|-------------------------------------|---|---|---|---------------------------------------|---------------------------------|---------------------------|---|---|--|--|---|--|--|--|--|--|--|--|--|-----------------|
| | | | | | | | (1) Process Codes (enter) | | | | | (2) Process Description [If a code is not entered in D (1)] | | | | | | | | | |
| 86 | D | 0 | 2 | 9 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 87 | D | 0 | 3 | 0 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 88 | D | 0 | 3 | 3 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 89 | D | 0 | 3 | 4 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 90 | D | 0 | 3 | 5 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 91 | D | 0 | 3 | 6 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 92 | D | 0 | 3 | 8 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 93 | D | 0 | 3 | 9 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 94 | D | 0 | 4 | 0 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 95 | D | 0 | 4 | 1 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 96 | D | 0 | 4 | 3 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 97 | F | 0 | 0 | 1 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 98 | F | 0 | 0 | 2 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 99 | F | 0 | 0 | 3 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 100 | F | 0 | 0 | 4 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 101 | F | 0 | 0 | 5 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 102 | F | 0 | 3 | 9 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 103 | W | T | 0 | 1 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 104 | W | T | 0 | 2 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 105 | U | 2 | 1 | 0 | | K | S | 0 | 2 | | | | | | | | | | | | |
| 106 | D | 0 | 0 | 1 | 153,9321,986,735 | K | S | 0 | 1 | | | | | | | | | | | | Includes Debris |
| 107 | D | 0 | 0 | 2 | | K | S | 0 | 1 | | | | | | | | | | | | Includes Debris |
| 108 | D | 0 | 0 | 3 | | K | S | 0 | 1 | | | | | | | | | | | | Includes Debris |
| 109 | D | 0 | 0 | 4 | | K | S | 0 | 1 | | | | | | | | | | | | Includes Debris |
| 110 | D | 0 | 0 | 5 | | K | S | 0 | 1 | | | | | | | | | | | | Includes Debris |
| 111 | D | 0 | 0 | 6 | | K | S | 0 | 1 | | | | | | | | | | | | Includes Debris |
| 112 | D | 0 | 0 | 7 | | K | S | 0 | 1 | | | | | | | | | | | | Includes Debris |
| 113 | D | 0 | 0 | 8 | | K | S | 0 | 1 | | | | | | | | | | | | Includes Debris |
| 114 | D | 0 | 0 | 9 | | K | S | 0 | 1 | | | | | | | | | | | | Includes Debris |
| 115 | D | 0 | 1 | 0 | | K | S | 0 | 1 | | | | | | | | | | | | Includes Debris |
| 116 | D | 0 | 1 | 1 | | K | S | 0 | 1 | | | | | | | | | | | | Includes Debris |

| | | | | | | | | | | | | |
|---------------------|---|---|---|---|---|---|---|---|---|---|---|---|
| EPA/State ID Number | W | A | 7 | 8 | 9 | 0 | 0 | 0 | 8 | 9 | 6 | 7 |
|---------------------|---|---|---|---|---|---|---|---|---|---|---|---|

Continuation of Section XIV. Description of Dangerous Waste

| Line Number | A. Dangerous Waste No. (enter code) | B. Estimated Annual Quantity of Waste | C. Unit of Measure (enter code) | D. Process | |
|-------------|-------------------------------------|---------------------------------------|---------------------------------|---------------------------|---|
| | | | | (1) Process Codes (enter) | (2) Process Description [If a code is not entered in D (1)] |
| 181 | | | | | |
| 182 | | | | | |
| 183 | | | | | |
| 184 | | | | | |

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|--|
| <p>XV. Map</p> <p>Attach to this application a topographic map of the area extending to at least one (1) mile beyond property boundaries. The map must show the outline of the facility; the location of each of its existing and proposed intake and discharge structures; each of its dangerous waste treatment, storage, recycling, or disposal units; and each well where fluids are injected underground. Include all springs, rivers, and other surface water bodies in this map area, plus drinking water wells listed in public records or otherwise known to the applicant within ¼ mile of the facility property boundary. The instructions provide additional information on meeting these requirements.</p> |
| <p>Topographic map is located in the Ecology Library</p> |
| <p>XVI. Facility Drawing</p> <p>All existing facilities must include a scale drawing of the facility (refer to Instructions for more detail).</p> |
| <p>XVII. Photographs</p> <p>All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, recycling, and disposal areas; and sites of future storage, treatment, recycling, or disposal areas (refer to Instructions for more detail).</p> |

| | | |
|--|-------------------------|---------------------------|
| <p>XVIII. Certifications</p> <p>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p> | | |
| <p>Operator Name and Official Title (type or print) Matthew S. McCormick, Manager U.S. Department of Energy Richland Operations Office</p> | <p>Signature</p> | <p>Date Signed</p> |
| <p>Co-Operator* Name and Official Title (type or print) John G. Lebew, III John C. Fulton President and Chief Executive Officer CH2M HILL Plateau Remediation Company</p> | <p>Signature</p> | <p>Date Signed</p> |
| <p>Co-Operator – Address and Telephone Number* P.O. Box 1600 Richland, WA 99352 (509) 376-0556</p> | | |
| <p>Facility-Property Owner Name and Official Title (type or print) Matthew S. McCormick, Manager U.S. Department of Energy Richland Operations Office</p> | <p>Signature</p> | <p>Date Signed</p> |

Comments

Section XII. Process Codes and Design Capacities – B.1. Amount, changed 7,608,654 L to 9,849,350 L for S02.

Section XIV. Description of Dangerous Waste – B. Estimated Annual Quantity of Waste, changed 88,497,000 K to 106,940,410 K for S04T02 on line numbers 1 through 35; 298,434,296 K to 106,940,410 K for T01 on line numbers 36 through 70; 30,433,326 K to 106,940,410 K for S02 on line numbers 71 through 105; and 1,986,735 K to 153,932 K for S01 on line numbers 106 through 140.

Section XVIII. Certifications – for Co-Operator “John G. Lehew III” to “John C. Fulton”.

Photographs. Added photograph of LERF and 200 Area ETE.

Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility

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Liquid Effluent Retention Facility



Typical Basin

Photo Taken 1992

200 Area Effluent Treatment Facility



Photo Taken 2005

