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Mr. David Lundstrom  
200 Area Section Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
1315 W. 4th Avenue  
Kennewick, Washington 99336

Mr. Douglas R. Sherwood  
Hanford Project Manager  
U. S. Environmental Protection Agency  
712 Swift Avenue, Suite 5  
Richland, Washington 99352



Dear Messrs. Lundstrom and Sherwood:

**200-BP-11 OPERABLE UNIT CHANGE REQUEST**

As a result of the Environmental Refocusing Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), the three parties have proposed Milestone M-20-36, Submit 216-A-29 Ditch and 216-B-63 Trench Closure/Postclosure Plans to the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) in coordination with the Work Plan for Operable Unit 200-BP-11 (to be satisfied to M-13-07). In an October 31, 1994, letter, Ecology requested that the U.S. Department of Energy prepare a change request (Attachment 1) to incorporate the 216-B-2-1, -2, and -3 ditches into the 200-BP-11 Operable Unit. This request is consistent with discussions between the three parties, as the 216-A-29 Ditch, 216-B-63 Trench, and the three 216-B-2 ditches all received similar waste and all discharged into the 216-B-3 Main Pond. Also provided, as Attachment 2, is a draft schedule from the 200-BP-11 Operable Unit Work/Closure Plan with the five additional waste management units. Please note that this is an updated version of the schedule provided to EPA and Ecology in the September 30, 1994, submittal of the 200-BP-11 Work/Closure Plan. Additionally, this schedule is provided at the request of Ecology and is not part of the Tri-Party Agreement change request.

Messrs. Lundstrom and Sherwood

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If you have any questions or need any further information, please feel free to contact Mr. Bryan Foley of the Plateau Remediation division on 376-7087.

Sincerely,

A handwritten signature in cursive script that reads "Steven H. Wisness".

Steven H. Wisness  
Hanford Project Manager

PRD:DMW

Attachments: As stated

cc w/attachs:

J. Wallace, Ecology  
P. Beaver, EPA  
G. Henckel, BHI  
R. Transbarger, BHI  
L. Arnold, WHC

Change Number M-20-94-06	<b>Federal Facility Agreement and Consent Order                  Change Control Form</b> <small>Do not use blue ink. Type or print using black ink.</small>	Date December 8, 1994
Originator <span style="float: right;">Phone</span> Rhett K. Tranbarger <span style="float: right;">372-1258</span>		
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title Waste Management Unit Additions and Boundary Changes to the 200-BP-11 Operable Unit		
Description/Justification of Change <p>Expand the 200-BP-11 Operable Unit boundaries to incorporate the 216-A-29 Ditch and 216-B-63 Trench RCRA (Resource Conservation and Recovery Act) TSD (Treatment, Storage, or Disposal) units, and the 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditch RCRA Past-Practice Units.</p> <p>This change is justified because it allows interrelated waste management units with similar physical characteristics and effluent disposal histories to be effectively investigated under one work/closure plan. Additionally, these changes will consolidate corrective actions within the 200-BP-11 Operable Unit which will effectively save time and budget in the overall cleanup effort at the Hanford Site.</p>		
Impact of Change <p>Expanding the 200-BP-11 Operable Unit boundaries will increase the scope of the field investigation and remedial activities in the operable unit.</p>		
Affected Documents <p>This change will affect the Tri-Party Agreement Appendix B, "Listing of Treatment, Storage, and Disposal Groups/Units;" Appendix C, "Prioritized Listing of Operable Units;" and the TPA Action Plan Work Schedule.</p>		
Approvals		
_____ DOE	_____ Date	___ Approved ___ Disapproved
_____ EPA	_____ Date	___ Approved ___ Disapproved
_____ Ecology	_____ Date	___ Approved ___ Disapproved

## 200-BP-11 OPERABLE UNIT BACKGROUND

The 200-BP-11 Operable Unit is located in the north-eastern portion of the 200 East Area of the Hanford Site. The operable unit currently consists of ten waste management units (WMUs), and encompasses approximately 775 acres (1.2 mi<sup>2</sup>). The 200-BP-11 WMUs are mainly associated with low level waste streams from the 221-B (B Plant) and 202-A (PUREX Plant) Buildings.

Five of the ten WMUs are designated Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and/or Disposal (TSD) Waste Management Units (WMUs) in the Tri-Party Agreement. These units are referred to as the 216-B-3 Main Pond (Main Pond), 216-B-3-3 Ditch, and the 216-B-3A, 216-B-3B, and 216-B-3C Expansion Ponds (Expansion Ponds). The Main Pond and 216-B-3-3 Ditch were decommissioned and backfilled in 1994. The three Expansion Ponds are being closed via the *216-B-3 Expansion Ponds Closure Plan*, DOE/RL-89-28, Rev. 2. The 216-B-3C Expansion Pond is the only active WMU within the operable unit.

The remaining five WMUs are designated RCRA Past-Practice units in the Tri-Party Agreement. They are referred to as the 216-B-3-1 Ditch, 216-B-3-2 Ditch, the 216-E-28 Contingency Pond, and Unplanned Releases UN-200-E-14 and UN-200-E-92. The 216-B-3-1 and 216-B-3-2 Ditches discharged to the Main Pond in the past and have been out of service since 1964 and 1970, respectively. The 216-E-28 Pond encompasses about 30 acres and has never been used. Unplanned release UN-216-E-14 occurred when a dike broke at the 216-B-3 Pond in 1958, and unplanned release UN-216-E-92 surfaced in 1980 as a result of radioactively contaminated Russian Thistle and has since been removed.

In September of 1994, Draft A of the *200-BP-11 Operable Unit and 216-B-3 Main Pond Work/Closure Plan*, DOE/RL-93-74, was completed and submitted to the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) in accordance with Tri-Party Agreement milestone M-13-07.

### JUSTIFICATION FOR INCORPORATION OF THE 216-A-29 DITCH, 216-B-63 TRENCH, AND 216-B-2-1, 216-B-2-2, AND 216-B-2-3 DITCHES INTO 200-BP-11

As shown on attached Figure 1, the 216-A-29 Ditch is currently located in the 200-PO-5 Operable Unit and the 216-B-63 Trench and 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditches are located in the 200-BP-8 Operable Unit. The 216-A-29 Ditch and 216-B-63 Trench are RCRA TSD units that are scheduled to have closure plans submitted to Ecology and EPA by May 1996 per TPA milestones M-20-36 and M-20-38, respectively. The 216-A-29 Ditch discharged to the 216-B-2-2 and 216-B-2-3 Ditches during its operational period. The 216-B-63 Trench did not discharge to other waste management units, however, it did received similar effluents as those received by the WMUs in the 200-BP-11 Operable Unit. The 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditches operated

consecutively from 1945 to 1987 by transporting effluent directly to the 216-B-3-2 and 216-B-3-3 Ditches. Rationale for incorporating these five waste management units into the 200-BP-11 Operable Unit include:

1. The 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditches fed the 216-B-3-1, 216-B-3-2, and 216-B-3-3 Ditches, which in turn discharged to the 216-B-3 Main Pond.
2. The 216-B-63 Trench is directly north of, and parallel to the 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditches. The proximity of the trench to the ditches makes it impractical to investigate these units separately.
3. The effluent received by the 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditches was similar to that of the 216-B-63 Trench.
4. The 216-A-29 Ditch has discharged to the 216-B-3-2 or 216-B-3-3 Ditch throughout its operational period.
5. All five of these WMUs have the same physical structure as the other WMUs in 200-BP-11 (i.e they are all surface impoundments) and can therefore be easily evaluated together.

The attached Figure 2 depicts the new 200-BP-11 Operable Unit boundaries that will result from incorporation of the 216-A-29 Ditch, 216-B-63 Trench, and 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditches.

**TPA CHANGES RESULTING FROM INCORPORATION OF THE 216-A-29 DITCH,  
216-B-63 TRENCH, AND 216-B-2-1, -2-2, AND -2-3 DITCHES INTO 200-BP-11**

**Appendix B.** Revise the 216-A-29 Ditch and 216-B-63 Trench as follows:

<u>Treatment, Storage, and Disposal</u>			<u>Planned Action</u>	
<u>Group Number</u>	<u>Group/Units</u>	<u>Operable Unit (if applicable)</u>	<u>Closure</u>	<u>Operating Permit</u>
D-2-3	216-A-29 Ditch	200-BP-11	X	
D-2-6	216-B-63 Trench	200-BP-11	X	

Appendix C. Revise 200-BP-11, 200-PO-5, and 200-BP-8 Operable Units as follows:

<u>Operable Unit</u>	<u>Title of Unit</u>	<u>Unit Type</u>	<u>Unit Category</u>
200-BP-11 (Source OU)	216-B-3	Pond	TSD (D-2-5)
	216-B-3-1	Ditch	RPP
	216-B-3-2	Ditch	RPP
	216-B-3-3	Ditch	TSD (D-2-5)
	216-B-3A	Pond	TSD (D-2-5)
	216-B-3B	Pond	TSD (D-2-5)
	216-B-3C	Pond	TSD (D-2-5)
	216-E-28*	Pond	RPP
	UN-200-E-14	Unplanned Release	RPP
	UN-200-E-92	Unplanned Release	RPP
	216-B-2-1	Ditch	RPP
	216-B-2-2	Ditch	RPP
	216-B-2-3	Ditch	RPP
	216-B-63	Trench	TSD (D-2-6)
	216-A-29	Ditch	TSD (D-2-3)

\* The 216-E-28 Pond was incorrectly identified as the 216-E-25 Pond.

200-PO-5 Delete the 216-A-29 Ditch. Also, delete the "Unit Category" for UN-200-E-67 (it is not a TSD).

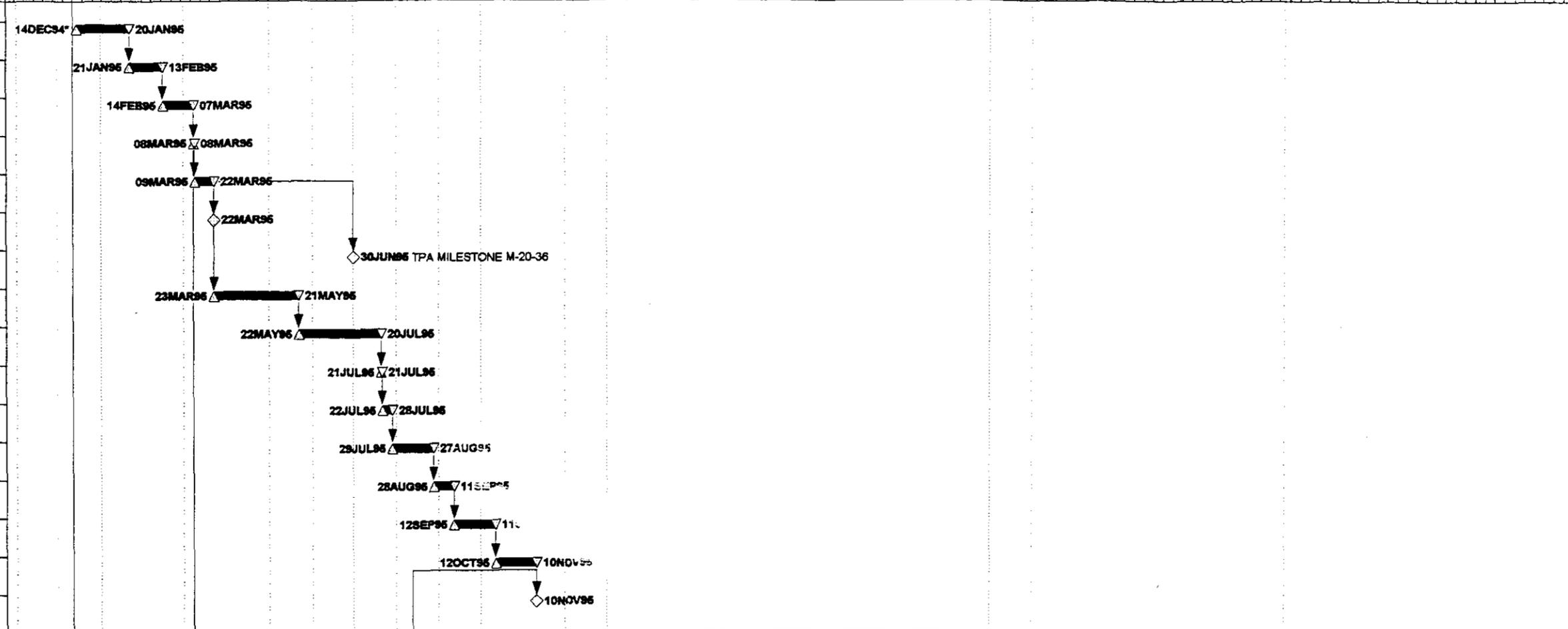
200-BP-8 Delete the 216-B-63 Trench, and the 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditches

#### TPA Action Plan Work Schedule

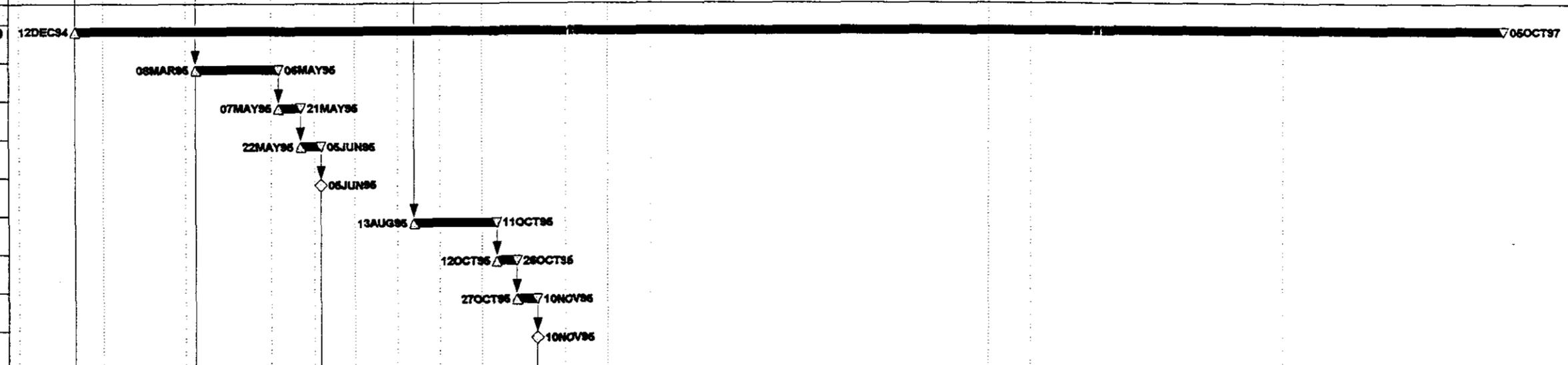
The TPA Action Plan Work Schedule will reflect that of a work plan, not a closure plan. The milestone date for submittal of Volume 1, Draft B of the 200-BP-11 Operable Unit Work/Closure Plan will be June 30, 1995.

Implementation of work will be conducted in accordance with the regulatory approved schedule provided in the approved version of Volume 1, Rev. 0 of the 200-BP-11 Operable Unit Work/Closure Plan.

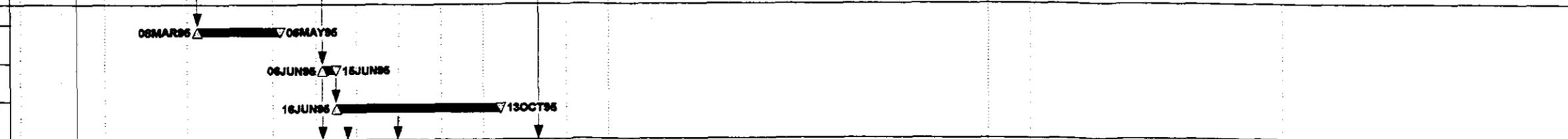
WORK/CLOSURE PLAN PREPARATION	
BHI/DOE CONCURRENT REVIEW OF REVISED WORK PLAN	38
DISPOSITION/INCORPORATION OF BHI/DOE COMMENTS	24
PREPARE WORK/CLOSURE PLAN, DRAFT B.	22
TRANSMIT WORK/CLOSURE PLAN DRAFT B. TO DOE-RL	1
DOE-RL DOCUMENT PROCESSING/TURN-AROUND	14
DOE-RL SUBMITS DRAFT B. TO REGULATORS FOR REVIEW	0
PA COMMITMENT: MILESTONE M-20-36	0
30-DAY REGULATOR REVIEW OF DRAFT B.	60
RECEIVE REG. COMMENTS - DISPOSITION - PREP REV. 0	60
TRANSMITTAL OF REV. 0 TO DOE-RL	1
DOE-RL TO SUBMIT REV. 0 TO REGULATORS	7
30-DAY REGULATOR REVIEW OF REV. 0	30
REGULATORS PREPARE REV. 0 FOR PUBLIC REVIEW	18
PUBLIC REVIEW/COMMENT PERIOD	30
RESPONSE BY REGULATORS / FINALIZE WORK PLAN	30
WORK PLAN APPROVAL	0



DOW PREPARATION	
PROJECT MANAGEMENT (TASK 1)	1,029
PREPARE TEST PIT EXCAVATION DOW	60
REGULATOR REVIEW AND COMMENT OF DOW	15
INCORPORATE COMMENTS AND REVISE DOW	15
DOW APPROVED	0
PREPARE VADOSE ZONE BOREHOLE DRILLING DOW	60
REGULATOR REVIEW AND COMMENT OF DOW	15
INCORPORATE COMMENTS AND REVISE DOW	15
DOW APPROVED	0



TASKS 2, 3, 4 AND 5	
NON-INTRUSIVE ACTIVITIES	60
MOBILIZATION	10
5 TEST PIT EXCAVATIONS/SAMPLING	120



Project Start: 12DEC94  
 Project Finish: 05OCT97  
 Start Date: 12DEC94  
 End Date: 01DEC94

Legend:  
 Early Bar: [Symbol]  
 Progress Bar: [Symbol]  
 Critical Activity: [Symbol]



