0047090

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

JUN 09 1995

95-PCA-335

Mr. Doug Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Mr. Mike Wilson, Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Sherwood and Wilson:

STATUS REPORT ON INACTIVE MISCELLANEOUS UNDERGROUND STORAGE TANKS

Sixty inactive miscellaneous underground storage tanks (IMUST) throughout the 200 Area on the Hanford Site were identified in Occurrence Report RL--WHC-TANKFARM-1995-0008, "Potential Environmental Regulatory Deficiency: Abandoned Miscellaneous Underground Storage Tanks," dated January 23, 1995. In February 1995, RL provided you preliminary information, best known at the time. The purpose of this correspondence is to update that preliminary information, and to provide to you the initial U.S. Department of Energy, Richland Operations Office (RL) programatic responsibilities that have been assigned for management of the various tanks.

As background, the IMUSTs were used as catch tanks, neutralization or settling tanks, uranium recovery, or waste handling tanks associated with the single-shell tank system or directly supporting a facility, and most have been inactive for more than twenty years. The tanks range in size from 950 to 50,000 gallons. Many were pumped to remove as much liquid as practical. During the mid-1980s, the tanks were included in an interim project to isolate the tanks (all inlet and outlet connections were sealed). The total capacity of the IMUSTs is less than one percent of the total waste tank volume at the Hanford Site. The IMUSTs are fenced and posted to control access.

The IMUSTs are listed on the enclosed table. In many cases, available information is limited. Some of the IMUSTs have been emptied. Tank volume information for those that still contain waste is provided on the enclosed table and was gathered from historical information. The waste in the IMUSTs is similar in composition to the waste in the single-shell tanks.

The relative risks associated with the wastes in these tanks has been evaluated based on available historical processing and operational data, and summarized for 50 of the tanks in a USDOE report in September 1994 ("Safety Issue Resolution Strategy Plan for Inactive Miscellaneuous Underground Storage Tanks," WHC-EP-0775). Sampling and analysis is planned during fiscal year 1995 on a representative tank to evaluate the risk posed by these tanks. The potential safety issues associated with the tanks are expected to be comparable to single-shell waste tank safety issues; however, because they are much smaller, the risk is proportionally lower. The priority of addressing the IMUSTs should not impact major commitments associated with the double and single shell tanks unless an IMUST is identified as having a legitimate safety concern.

These tanks are included in the Waste Information Data System (WIDS), which is the authority file for the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement). Some of the IMUSTs that are located within vaults are included in the description of the vault in WIDS, and not as separate entries. The vaults associated with these tanks are identified on the enclosed table.

The majority of the tanks are located in an operable unit that has either a Resource Conservation and Recovery Act or a Comprehensive Environmental Response, Compensation and Liability Act past-practice designation. Therefore, unless a significant safety risk is identified for a specific IMUST, these tanks will be managed as past-practice units until closure of the operable unit. Closure will be consistent with the closure protocol required for the associated operable unit. Those tanks that are identified as treatment, storage, or disposal units are managed and will be closed in accordance with Washington Administrative Code 173-303. As indicated previously, RL programatic responsibilities have been tentatively identified in the enclosed Table; however, these may change slightly as more information becomes available.

As discussed with Mr. G. T. Tebb, of the State of Washington Department of Ecology, on February 14, 1995, efforts continue to identify similar tanks outside of the 200 Areas of the Hanford Site, as well as any additional tanks within the 200 Areas. As tanks are discovered, they will be placed in WIDS and evaluated for safety and environmental risk considerations. Programmatic responsibilities will be defined to ensure appropriate management strategies are identified.

Should you require additional information, please contact Mr. F. R. Miera of my staff on 373-7589.

Sincerely,

for

James E. Rasmussen, Division Director
Environmental Assurance, Permits,
and Policy Division

EAP:FRM

Enclosure

cc w/encl:
G. T. Tebb, Ecology
W. T. Dixon, WHC
E. M. Greager, WHC
R. Jim, YIN
D. Powaukee, NPT
J. Wilkinson, CTUIR

#	Programmatic Responsibility	Tank #/ID	Tank Description	Nominal Tank Capacity	Tank Volume				Regulatory Status[2]		
					Sludge Volume (gal)	Liquid Volume (gal)	Total Volume (gal)	Notes	Prelim.	Final	Part A Status
1	ER+	240-S-302	Catch Tank, O/S 3/87 - confirmed leaker	17,684	no data	no data	2,276	Monitored by leak detector. Est. 100 gal. interstitial liquid	CPP or RPP		
	241-WR Vault										
2	ER	241-WR-001	Uranium Recovery, Isolated - possibly collapsed, O/S 1976	50,000	no data	no data	12,000	Tank believed empty; est. 12,000 gal in sump		CPP	
3	ER	241-WR-002	Uranium Recovery, Isolated - possibly "floating", O/S 1976	50,000	no data	no data	35,000	Tank believed empty; est. 35,000 gal. in sump		CPP	
4	ER	241-WR-003	Uranium Recovery, Isolated - O/S 1976	50,000	no data	no data	0	Believed empty; unknown sump waste volume		CPP	
5	ER	241-WR-004	Uranium Recovery, O/S 1976	50,000	no data	no data	0	Believed empty; unknown sump waste volume		CPP	
6	ER	241-WR-005	Uranium Recovery, O/S 1976	50,000	no data	no data	no data	Value unknown (may be empty)		CP?	
7	ER	241-WR-006	Uranium Recovery, O/S 1976	50,000	no data	no data	min.	Minimum heel of thorium solution		CP?	
8	ER	241-WR-007	Uranium Recovery, O/S 1976	50,000	no data	no data	0	Believed empty		CP?	
9	ER	241-WR-008	Uranium Recovery, O/S 1976	50,000	no data	no data	0	Believed empty		CP?	

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[1] = Assigned to an operable unit per TPA Change Request C-93-05.
[3] = Special concerns re: Pu concentration issues if tank is disturbed.
+ = Programmatic responsibility may change.

[2]MUST Regulatory Status Criteria
(Based on Discussions Held at 1/26/95 Meeting)

Disposal (abandonment) that occurred prior to November 23, 1987, is not regulated by RCRA as a TSD.

Ongoing storage that continued beyond November 23, 1987, is regulated as a TSD.

A tank is abandoned when use of the tank ceased, even if remaining waste was left in place, if no waste was added or product removed. In such a case, disposal took place at the time use of the tank ceased. An abandoned/out-of-service tank is not a storage facility (unit).

Examples of abandonment ("ceased use") would include:

- Physical isolation of piping, or
- Shut down of process units that generated the wastes that went to the tank, even though piping is still connected, or
- Process unit changes such that waste was no longer generated, even though piping is still connected.

#	Programmatic Responsibility	Tank #/ID	Tank Description	Nominal Tank Capacity	Tank Volume				Regulatory Status[2]		
					Sludge Volume (gal)	Liquid Volume (gal)	Total Volume (ga)	Notes	Prelim.	Final	Part A Status
10	ER	241-WR-009	Uranium Recovery, O/S 1976	50,000	0	23,000	23,000	Conflicting volume data (may be empty)		CPP	
11	ER	241-B-361	Settling, O/S 1947 (isolated & stabilized, 1985)	36,000	20,678	0	20,678	No pumpable liquids		CPP	
12	ER	241-CX-70	Waste Handling, O/S 1957 (Decon)	30,000	0	0	0	Flushed and emptied		TSD	241-CX Tk sys
13	ER	241-CX-71	Neutralization, O/S 1957 (isolated 1979(?))	1,000	930	0	930	Grout over 4 ft limestone and 2.15 ft sludge		TSD	241-CX-Tk sys
14	ER	241-CX-72	Experimental, O/S ? (grouted in 1986)	2,300	650	0	650	Filled with grout over sludge		TSD	241-CX-Tk sys
15	ER	241-T-361	Settling, O/S 1947 (isolated & stabilized 1985)	36,000	24,500	0	24,500		RPP or CPP		
16	ER	241-U-361	Settling, O/S 1967 isolated; (stabilized in 1985)	36,000	27,700	100	27,800	Little or no liquid		CPP	
17	ER+	270-W	Neutralization, O/S 1958 (?) (isolated 1970) Tank under new bldg (2715-UA)	3,780	no data	no data	no data	contents unknown		CPP	
18	ER+	276-S-141 (276-S-305A)	Hexone Tank near S-Plant (REDOX), two numbers for same tank							TSD	Hexone S & T Facility

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#	Programmatic Responsibility	Tank #/ID	Tank Description	Nominal Tank Capacity	Tank Volume				Regulatory Status[2]		
					Sludge Volume (gal)	Liquid Volume (gal)	Total Volume (gal)	Notes	Prelim.	Final	Part A Status
19	ER	276-S-142 (276-S-305B)	Hexone Tank near S-Plant (REDOX), two numbers for same tank							TSD	Hexone S & T Facility
20	B Plant	270-E-1	Neutralization, O/S 1957 (isolated in early '60s)	4,185	3,800	0	3,800	Possible 1,400 gal. interstitial liquid	CPP or RPP		
21	PFP[3]	241-Z-361	Settling, O/S 1976 (isolated in 1973 and stabilized in 1975)	40,500	20,000	200	20,200	Layered "mud-like" sludge		CPP	
Diversion Box 231-W-151											
22	TWRS[1]	231-W-151-001	Settling, O/S 1974	4,000	0	1,430	1,430			CPP	
23	TWRS[1]	231-W-151-002	Settling, O/S 1974	950	10	950	960			CPP	
24	TWRS[1]	241-Z-8	Settling, O/S 1962 (isolated and stabilized)	15,435	500	0	500	Liquid removed 10-19-74		CPP	
25	TWRS	241-A-302B	Catch Tank, O/S 1980 (isolated 9/85 and stabilized 1990)	13,500	no data	no data	3,600	Monitored by leak detector.		RPP+	SST+
26	TWRS	241-B-301	Catch Tank, O/S 1984	36,000	21,660	590	22,250			RPP+	SST+
27	TWRS	241-B-302B	Catch Tank, O/S 1985 (5/6/85 interim stabilized)	13,684	490	4,240	4,930			RPP+	SST+

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[2]MUST Regulatory Status Criteria
(Based on Discussions Held at 5/25/95 Meeting)

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#	Programmatic Responsibility	Tank #/ID	Tank Description	Nominal Tank Capacity	Tank Volume				Regulatory Status[1]		
					Sludge Volume (gal)	Liquid Volume (gal)	Total Volume (gal)	Notes	Prelim.	Final	Part A Status
28	TWRS	241-BX-302A	Catch Tank, O/S 1985	17,684	840	0	840	Due to leakage, tank 302A replaced in 10/91 with tank 241-S-304. Tank 302A was in operation from 1949 to 1991.		RPP*?	SST*
29	TWRS	241-BX-302B	Catch Tank, O/S 1985 (isolated 1985)	11,389	950	90	1,040			RPP*	SST*
30	TWRS	241-BX-302C	Catch Tank, O/S 1985 (isolated and stabilized)	11,378	640	230	870			RPP*	SST*
31	TWRS	241-C-301	Catch Tank, O/S 1983 (isolated)	36,000	9,000	1,470	10,470			RPP*	SST*
32	TWRS	241-S-302A	Catch Tank, O/S 1991 (isolated)	17,684	no data	no data	5,110	Monitored by leak detector. 2 ft grout over 1 ft sand. Although active after 1987, this tank is ancillary to and will be closed with the associated SSTs.		RPP*	SST*
33	TWRS	241-S-302B	Catch Tank, O/S 1985 (isolated and stabilized)	14,314	0	0	0	Emptied		RPP*	SST*
34	TWRS	241-SX-302	Catch Tank, O/S 1983 (isolated and stabilized 1984)	17,684	1,050	300	1,350			RPP*	SST*
35	TWRS	241-T-301B	Catch Tank, O/S 1985 (isolated and stabilized 7/85)	36,000	21,660	590	22,250			RPP*	SST*

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#	Programmatic Responsibility	Tank #/ID	Tank Description	Nominal Tank Capacity	Tank Volume				Regulatory Status[1]		
					Sludge Volume (gal)	Liquid Volume (gal)	Total Volume (gal)	Notes	Prelim.	Final	Part A Status
36	TWRS	241-TX-302A	Catch Tank, O/S 1982 (stabilized 1986)	17,684	2,450	30	2,480			RPP*	SST*
37	TWRS	241-TX-302B	Catch Tank, O/S ? (stabilized and isolated in 1954)	17,684	no data	no data	1,320	Monitored by leak detector		RPP*	SST*
38	TWRS[1]	241-TX-302BR	Catch Tank, O/S 1954 (isolated in 1954)	12,000	no data	no data	no data	Contents unknown		RPP*	SST*
39	TWRS[1]	241-TX-302XB	Catch Tank, O/S 1985 (isolated and stabilized 6/85)	14,314	110	250	360			RPP*	SST*
40	TWRS	241-TY-302A	Catch Tank, O/S 1981 (isolated and stabilized 6/85)	17,684	450	0	450			RPP*	SST*
41	TWRS	241-TY-302B	Catch Tank, O/S 1981 (isolated and stabilized)	14,314	0	0	0	Emptied		RPP*	SST*
	244-BXR Vault - Isolated in 1985+										
42	TWRS	244-BXR-001	Uranium Recovery, O/S 1957 (isolated 1985)	50,000	7,200	0	7,200	Minimum sludge in sump		RPP*	SST*
43	TWRS	244-BXR-002	Uranium Recovery, O/S 1957 (isolated 1985)	15,000	1,800	380	2,180	Est. 280 gal. sludge in sump		RPP*	SST*
44	TWRS	244-BXR-003	Uranium Recovery, O/S 1957 (isolated 1985)	15,000	1,450	360	1,810	Est. 8,300 gal. soft sludge in sump		RPP*	SST*
45	TWRS	244-BXR-011	Uranium Recovery, O/S 1955	50,000	7,000	100	7,100	Est. 4,200 gal. soft sludge in sump		RPP*	SST*

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#	Programmatic Responsibility	Tank #/ID	Tank Description	Nominal Tank Capacity	Tank Volume				Regulatory Status[2]		
					Sludge Volume (gal)	Liquid Volume (gal)	Total Volume (gal)	Notes	Prelm.	Final	Part A Status
	244-TXR Vault[1]										
46	TWRS[3]	244-TXR-001	Uranium Recovery, O/S 1956 (accumulator tank stabilized in 1984 - "questionable integrity") (isolated)	50,000	2,300	50	2,350	Minimum sludge in sump		RPP*	SST*
47	TWRS[3]	244-TXR-002	Uranium Recovery, O/S 1956 (stabilized in 1984) (isolated)	15,000	2,950	0	2,950	Minimum sludge in sump		RPP*	SST*
48	TWRS[3]	244-TXR-003	Uranium Recovery, O/S 1956 (stabilized in 1984) (isolated)	15,000	6,500	0	6,500	Minimum sludge in sump		RPP*	SST*
	244-UR Vault - Interim stabilized in 1985										
49	TWRS	244-UR-001	Uranium Recovery, O/S 1957 (isolated and stabilized in 1985)	50,000	1,850	390	2,240	Liquid and sludge in sump		RPP*	SST*
50	TWRS	244-UR-002	Uranium Recovery, O/S 1957 (isolated; stabilized 1985)	15,000	2,300	570	2,870	Conflicting liquid level data (214 or 570 gal.)		RPP*	SST*
51	TWRS	244-UR-003	Uranium Recovery, O/S 1957 or 1976 (?) (isolated; stabilized 1985)	15,000	1,570	0	1,570	Liquid and sludge in sump		RPP*	SST*
52	TWRS	244-UR-004	Uranium Recovery, O/S 1957 or 1976 (?) (isolated; stabilized 1985)	8,330	min.	min.	min.	Minimum heel		RPP*	SST*
53	TWRS	241-BR-311A	Southwest of B Plant								

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					Sludge Volume (gal)	Liquid Volume (gal)	Total Volume (gal)	Notes	Prelim.	Final	Part A Status
54	TWRS	241-AX-151	Diverter Station with several tanks inside, outside A Tank Farm - individual tanks will have separate entries							TSD	SST
55	TWRS	216-TY-201	East of TY Tank Farm; flush tank								
56	TWRS	216-BY-201	North of BY Tank Farm, flush tank								
57	TWRS	242-TA-R1	Receiver tank for Z Plant, very hot radiologically					Tank is inside 242-TA Vault. Vault is in WIDS; description includes this tank.			
58	TWRS	242-T-135	Outside of 242T evaporator, decontamination tank					This tank is partially above ground.			
59	TWRS	2435-TK-1	Decon tank, can be added to DMUST list.					This was added to WIDS as an alias to 200-W-7.			
60	TWRS	213-W-TK-1	Decon Tank, near 272-WA. Documentation is being researched to determine if tank ever received waste. Has in the past and continues to receive rain water, and is periodically pumped. Prior to being pumped, tank water was sampled and clean released.	1875			1875	Suspect that tank is primarily filled with water.			

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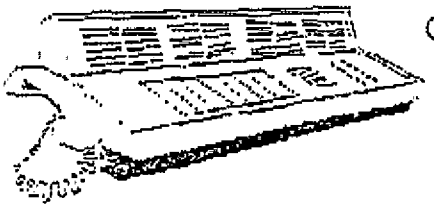
6-19-1

U.S. Department of Energy, Richland Field Office

P.O. Box 550

Richland, WA 99352



Office of Environmental Assurance, Permits, and Policy

FAX NUMBER (509) 376-0306

VERIFICATION NUMBER (509) 376-5441

Date: 6/30/95

TO: Phil Branson

FAX NUMBER _____

Office/Location _____ Telephone # _____

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Messages

Per Your Request