



## New Milestones Proposed for the Tri-Party Agreement

Complete evaluation  
of all double-shell tanks

Washington State Department of Ecology • U.S. Department of Energy • U.S. Environmental Protection Agency

### Request for Public Comment

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#### EDMC

The Washington State Department of Ecology (Ecology) and the U.S. Department of Energy's Office of River Protection (USDOE) are requesting public comment on a proposal to add milestones to the Tri-Party Agreement (TPA) that would guide integrity assessments of the structural soundness of double-shell tanks at Hanford.

The 45-day public-comment period on the addition of Major Milestone Series M-48-00 to the TPA is scheduled for July 16 through August 30, 2001.

### Background

There are 28 double-shell tanks (DSTs) on the Hanford site. These tanks were built between 1968 and 1986. Each DST holds up to 1 million gallons of highly radioactive hazardous wastes.

In 1994, the parties to the TPA added Major Milestone Series M-32-00 to the TPA to address various dangerous-waste tank systems at Hanford that did not meet the requirements of the federal Resource, Conservation and Recovery Act (RCRA). M-32 required that USDOE "complete identified dangerous-waste tank corrective actions" (including those relating to double-shell-tank integrity assessments) by September 30, 1999.

USDOE submitted letters to Ecology in September 1999 stating that the milestone had been met. However, Ecology's follow-up investigation determined that the milestone had not been completed. In June 2000, Ecology issued a penalty to USDOE for not complying with the milestone.

Under the authority of the state Hazardous Waste Management Act, Ecology issued administrative orders to USDOE and CH2M HILL Hanford Group Inc. (CHG), its tank farms contractor. The administrative orders required that they proceed with structural integrity testing of the double shell tank system and report their findings.

USDOE invoked the TPA dispute-resolution process. After dispute-resolution discussions ended with no agreement, Ecology issued a final determination in August 2000 that the penalty was to be paid in full, and that the administrative orders were not subject to the TPA dispute-resolution process.

Subsequently, USDOE and CHG appealed to the Washington State Pollution Control Hearings Board. Prior to the scheduled hearing, USDOE and CHG agreed to pay the penalty and comply with the requirements of the administrative orders, provided the orders were incorporated into the TPA. Consequently, the hearing was cancelled, and Ecology and USDOE now propose new TPA milestones that would, in effect, transfer the requirements of the orders into the TPA.

## Proposed Change

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M-48-00 would require USDOE to assess the structural integrity of all 28 double-shell tanks at Hanford by September 30, 2006, then re-assess six tanks by September 30, 2007.

Structural-integrity assessments examine whether there are any defects, such as flaws, cracks, or pitting, in the tank walls that might indicate a potential for leaks or tank failure.

The assessment criteria includes the design standards of the tanks, the materials and processes used to build the tanks, corrosion protection procedures, the ages of the tanks, and the types of waste stored or treated now or in the past, and what will be stored or treated there in the future.

The assessment process includes examining the interior walls of the underground tanks by lowering cameras into the tanks and using ultrasonic testing, which uses sound waves to check for structural flaws around the external surfaces of the tank walls.

Under M-48, USDOE would be required to evaluate four tanks each year until all 28 double-shell tanks have been examined. USDOE would then be required to issue an overall integrity-assessment report summarizing the condition of the entire double-shell tank system.

After all 28 DSTs are evaluated, USDOE will be required to re-assess six tanks to provide data on how fast the tanks may be corroding and report on their status by September 30, 2007.

## Providing Comment

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To request copies of the complete change package or to submit comments in writing, please contact:

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To review the change package, visit one of the information repositories listed on the next page, or access the following Web sites:

Department of Ecology  
U.S. Department of Energy  
USDOE Office of River Protection

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