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**Department of Energy**

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

**0040595**

95-LEP-016

MAR 13 1995

Mr. Chuck Clarke, Regional Administrator  
U.S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue  
Seattle, Washington 98101

Ms. Mary Riveland, Director  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600

Dear Mr. Clarke and Ms. Riveland:

CHANGE REQUEST M-17-95-02: REVISE M-17-00A TO ALLOW FOR TEMPORARY STORAGE PENDING IMPLEMENTATION OF BAT/AKART, AND CHANGE REQUEST M-17-95-03: REVISE INTERIM MILESTONES M-17-14 AND M-17-29 TO ALLOW DELAYED OPERATION OF 200 AREA EFFLUENT TREATMENT FACILITY (ETF)

The subject formal Class I Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) change control form M-17-95-02: "Revise M-17-00A to Allow For Temporary Storage Pending Implementation of BAT/AKART," (Attachment 1), Class II Tri-Party Agreement change control form M-17-95-03: "Revise Interim Milestones M-17-14 and M-17-29 to Allow Delayed Operation of 200 Area Effluent Treatment Facility (ETF)," (Attachment 2), and the corresponding State of Washington, Department of Ecology (Ecology) Consent Order No. DE-91NM-177 Modification (Attachment 3) have been approved by the U.S. Department of Energy, Richland Operations Office (RL) and are hereby transmitted for your approval. The original forms are being provided to Ecology. Upon disposition, please transmit the Tri-Party Agreement forms to the U.S. Environmental Protection Agency. In accordance with revised Tri-Party Agreement Article XL, paragraph 122, your action is requested within the specified 14 day period.

These change requests are necessary to revise the descriptive wording of major milestone M-17-00A and to extend the due dates of interim milestones M-17-14 and M-17-29, due to the schedule delay in construction turnover of the 200 Area ETF.



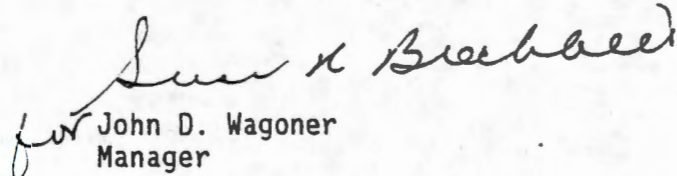
Mr. Clarke & Ms. Riveland  
95-LEP-016

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Should you have any questions regarding this matter, please feel free to call me on (509) 376-7395 or June Hennig of the Waste Programs Division on (509) 376-1366.

Sincerely,

  
for John D. Wagoner  
Manager

cc: A. J. DiLiberto, WHC  
S. D. Godfrey, WHC  
M. N. Jaraysi, Ecology  
M. A. Selby, Ecology  
R. F. Stanley, Ecology  
D. R. Sherwood, EPA

Change Number M-17-95-02	<b>Federal Facility Agreement and Consent Order                  Change Control Form</b> Do not use blue ink. Type or print using black ink.	Date 3/9/95
Originator <span style="float: right;">Phone</span> S. D. Godfrey <span style="float: right;">(509) 372-0501</span>		
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title      Revise M-17-00A to Allow for Temporary Storage Pending Implementation of BAT/AKART		
Description/Justification of Change Revise Major Milestone M-17-00A. <div style="text-align: right;">(Continued on next page)</div>		
Impact of Change Milestone M-17-00A is revised by this change to allow temporary storage of 242-A Evaporator Process Condensate prior to implementation of Best Available Technology and All Known, Available, and Reasonable methods of prevention, control, and Treatment (BAT/AKART) and will be met without impact to the scheduled completion date. The 242-A Evaporator has space in the LERF to operate through at least June of 1996. As a result, there are no foreseeable impacts to the environment or to other TPA commitments due to this change.		
Affected Documents Hanford Federal Facility Agreement and Consent Order, Fourth Amendment, January 1994, Appendix D (Table D, pages D-23 and D-24).		
Approvals <div style="margin-top: 10px;"> <span style="font-family: cursive; font-size: 1.2em;">Susan L. Brockwell</span> / <i>Acting Manager</i>      <u>3/13/95</u>      <input checked="" type="checkbox"/> Approved      <input type="checkbox"/> Disapproved                      DOE      Date                 </div> <div style="margin-top: 10px;">                     _____      _____      <input type="checkbox"/> Approved      <input type="checkbox"/> Disapproved                      EPA      Date                 </div> <div style="margin-top: 10px;">                     _____      _____      <input type="checkbox"/> Approved      <input type="checkbox"/> Disapproved                      Ecology      Date                 </div>		

Description/Justification of Change (continued)

The revised milestone is as follows:

M-17-00A Complete Liquid Effluent Treatment Facilities/Upgrades 6/30/1995  
for All Phase I Streams.  
Hanford currently has 19 Phase I liquid effluent streams being discharged to cribs, ponds, or ditches. Phase I streams are defined in the "Annual Status Report of the Plan and Schedule to Discontinue Disposal of Contaminated Liquids into the Soil Column at the Hanford Site," September 1988. Some of the cribs, ponds, or ditches are RCRA waste disposal units. These, along with others, are located in areas requiring inactive site investigations/remedial actions. Liquid effluent streams are classified as Phase I streams based upon radionuclide/chemical content, regulatory requirements relative to the waste disposal unit, chemical spill potential, and waste disposal unit life expectancy. Each of the Phase I effluent streams shall be either treated, ~~or eliminated, as defined in the above referenced report~~ or stored pending implementation of BAT/AKART. ~~BAT/AKART for stored streams shall be implemented no later than March 31, 1996.~~ Interim milestones for Phase I streams include the development and implementation of an impact assessment methodology, sampling and analysis plans, treatment system design and construction commitments, interim flow restrictions and dates for ceasing discharge. ~~Specific interim/target milestone dates for each stream and any associated treatment or disposal facilities are included in Appendix D work schedules.~~

The 200 Area Effluent Treatment Facility (ETF) is currently under construction. An initial architect/engineering firm design-construction schedule for the 200 Area ETF was submitted to EPA and Ecology by RL on February 28, 1992 (M-17-14A), which identified a project completion date of October 5, 1994. Subsequently, TPA change M-17-93-07 extended the date for full scale hot startup (M-17-14) and implementation of BAT/AKART (M-17-29) from October 31, 1994, to June 30, 1995.

The construction contractor notified WHC/RL of a delay in construction completion from September 7, 1994, until November/December 1994 due to problems with several plant systems (primarily the computer control system). Based upon remaining work scope and past contractor performance, an actual construction completion closer to the March/April 1995 time frame is projected. Delays in construction completion past October 1, 1994, are impacting the baseline operational readiness and startup schedule, resulting in a day-for-day slip in the associated TPA milestones (M-17-14 and M-17-29). Approximately 9 months of startup preparations are required by WHC prior to initiating plant operations. This consists of about 6 months of testing, training, and procedure activities, and about 3 months of readiness review activities.

Major milestone M-17-00A has 126 associated interim milestones of which 108 have been completed either on time or ahead of time. Included with this milestone are 22 waste water streams (19 Phase I streams and 3 Phase II streams) from 15 different facilities, with all streams on schedule to meet

TPA milestones except the 242-A Evaporator Process Condensate. TPA milestones M-17-14 and M-17-29 cover hot startup of the 200 Area ETF and implementation of BAT/AKART for the process condensate stream, respectively. Both milestones are associated with the treatment of the process condensate stream to allow the 242-A Evaporator to continue operating.

After several meetings and information briefings, the parties have agreed to revise descriptive wording of milestone M-17-00A to allow for successful completion not only by treatment or elimination of Phase I streams, but also by storage of the streams until BAT/AKART implementation. This change meets the original intent of the milestone and of the congressional mandate to cease discharges of untreated liquid effluents to the soil column.

With the expected delay in startup of the 200 Area ETF, the 242-A Evaporator continues to operate with the process condensate stream being stored in the Liquid Effluent Retention Facility (LERF). The LERF has capacity to store this waste water until at least June 1996 based on the current 242-A Evaporator operating schedule.

TPA milestones M-17-14 and M-17-29 are unchanged by this change request.

Change Number  M-17-95-03	<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  3/9/95
Originator  S. D. Godfrey		Phone  (509) 372-0501
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title  Revise Interim Milestones M-17-14 and M-17-29 to Allow Delayed Operation of 200 Area Effluent Treatment Facility (ETF)		
Description/Justification of Change  Revise Interim Milestones M-17-14 and M-17-29.  <div style="text-align: right;">(Continued on next page)</div>		
Impact of Change  Interim milestones M-17-14 and M-17-29 are extended from 6/30/95 to 3/31/96 by this change request, based on the ETF construction delay and the need date for the ETF to support continuing Evaporator operations. The 242-A Evaporator has space in the LERF to operate through at least June of 1996. The March 31, 1996 date is chosen as an acceptable mid-point between the earliest projected milestone completion date (10/30/95) and the point at which Evaporator operations are dependant upon ETF startup (6/1/96). This change results in no foreseeable adverse impacts to the environment, to the health and safety of the public, or to other TPA commitments.		
Affected Documents  Hanford Federal Facility Agreement and Consent Order, Fourth Amendment, January 1994, Appendix D (Table D, pages D-32 and D-37, and Action Plan Work Schedule, pages 8 and 11 of 40).		
Approvals <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 30%;"> <p>DOE </p> <hr style="border: 0; border-top: 1px solid black; margin-top: 5px;"/> <p>EPA</p> <hr style="border: 0; border-top: 1px solid black; margin-top: 5px;"/> <p>Ecology</p> <hr style="border: 0; border-top: 1px solid black; margin-top: 5px;"/> </div> <div style="width: 30%;"> <p style="text-align: center;">3/13/95</p> <p style="text-align: center;">Date</p> </div> <div style="width: 30%;"> <p style="text-align: center;"> <input checked="" type="checkbox"/> Approved    <input type="checkbox"/> Disapproved                 </p> <p style="text-align: center;"> <input type="checkbox"/> Approved    <input type="checkbox"/> Disapproved                 </p> <p style="text-align: center;"> <input type="checkbox"/> Approved    <input type="checkbox"/> Disapproved                 </p> </div> </div>		

Description/Justification of Change (continued)

The revised milestones are as follows:

M-17-14 Project C-018H, Condensate Discharge of	Initiate Full Scale Hot Operations for "242-A Evaporator/PUREX Plant Process Treatment Facility," with Permitted Treated Effluent to the Soil Column	6/30/1995 3/31/1996
M-17-29 Evaporator Process	Implement BAT/AKART for the 242-A Condensate	6/30/1995 3/31/1996

The 200 Area Effluent Treatment Facility (ETF) is currently under construction. An initial architect/engineering firm design-construction schedule for the 200 Area ETF was submitted to EPA and Ecology by RL on February 28, 1992 (M-17-14A), which identified a project completion date of October 5, 1994. Subsequently, TPA change M-17-93-07 extended the date for full scale hot startup (M-17-14) and implementation of BAT/AKART (M-17-29) from October 31, 1994, to June 30, 1995. Both milestones are associated with the treatment of the 242-A Evaporator Process Condensate stream.

The construction contractor notified WHC/RL of a delay in construction completion from September 7, 1994, until November/December 1994 due to problems with several plant systems (primarily the computer control system). Based upon remaining work scope and past contractor performance, an actual construction completion closer to the March/April 1995 time frame is projected. Delays in construction completion past October 1, 1994, are impacting the baseline operational readiness and startup schedule, resulting in a day-for-day slip in the associated TPA milestones (M-17-14 and M-17-29). Approximately 9 months of startup preparations are required by WHC prior to initiating plant operations. This consists of about 6 months of testing, training, and procedure activities, and about 3 months of readiness review activities. Schedule recovery actions have been successful in reducing the nine-month post-construction startup schedule to about five months. However, these actions cannot mitigate the entire impact from this significant construction delay to meet the interim milestone due dates.

The earliest projected startup date for the ETF, based on schedule recovery actions, is now September 29, 1995, with discharge of treated effluent to the disposal site by October 30, 1995. The 242-A Evaporator continues to operate with the process condensate stream being stored in the Liquid Effluent Retention Facility (LERF). The 242-A Evaporator has space in LERF to store its process condensate until at least June of 1996 and is not scheduled to operate again until March/April of 1997.

Based on the ETF construction delay and the need dates for the ETF to support continuing Evaporator operations, the parties agree to extend the due dates for completion of interim milestones M-17-14 and M-17-29 from 6/30/95 to 3/31/96. This date is chosen as an acceptable mid-point between the earliest

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projected milestone completion date (10/30/95) and the point at which Evaporator operations are dependant on ETF startup (6/1/96). This change is justified by the fact that there are no foreseeable adverse impacts to the environment, the health and safety of the public, or to other TPA commitments.



## DEPARTMENT OF ECOLOGY

IN THE MATTER OF THE COMPLIANCE BY )  
 United States Department of Energy )  
 with Section 90.48 RCW and the )  
 Rules and Regulations of the )  
 Department of Ecology )

NINTH  
 MODIFICATION OF  
 CONSENT ORDER  
 No. DE 91NM-177

To: United States Department of Energy  
 Richland Field Office  
 P.O. Box 550  
 Richland, WA 99352

I. MODIFICATION

In accordance with Section 1.V, Page 3, of the above referenced Consent Order, the parties agree to a modification which will revise a portion of the following section:

1. Revise Section 3: 242-A Evaporator and PUREX Condensate and Ammonia Scrubber Distillate Treatment Facility, Table 1, "Project C-018H Milestones" to read as follows:

"Initiate full scale hot operations with permitted discharge of treated effluent to the soil column," revise the date in the "OTHER SUBMITTALS" column from "6/95" to "3/96."

All other terms and conditions contained in the Consent Order remain in full force and effect.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, at  
 Kennewick, Washington.

\_\_\_\_\_  
 Steve M. Alexander, Manager  
 Perimeter Areas  
 State of Washington  
 Department of Ecology

*Susan R. Brechbill*  
 Susan R. Brechbill, Acting Manager  
~~John D. Wagoner, Manager~~  
 U.S. Department of Energy  
 Richland Operations Office

## CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
J. D. Wagoner, RL	C. Clarke, EPA M. Riveland, Ecology	Incoming: 9501410

Subject: CHANGE REQUEST M-17-95-02: REVISE M-17-00A TO ALLOW FOR TEMPORARY STORAGE PENDING IMPLEMENTATION OF BAT/AKART, AND CHANGE REQUEST M-17-95-03: REVISE INTERIM MILESTONES M-17-14 AND M-17-29 TO ALLOW DELAYED OPERATION OF 200 AREA EFFLUENT TREATMENT FACILITY (ETF)

### INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	X
		W. T. Alumkal	S7-85	X
		L. D. Arnold	B2-35	X
		B. A. Austin	B3-03	X
		A. J. Diliberto, Assignee	H6-10	X
		D. L. Flyckt	T7-39	X
		C. J. Geier	R2-36	X
		S. D. Godfrey	B2-35	X
		G. W. Jackson	S6-71	X
		J. R. Kelly	R3-28	X
		J. J. Luke	H6-25	X
		P. J. Mackey	B3-15	
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		R. D. Morrison	B2-35	X
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		R. E. Traister, Sr. Staff	B3-63	X
		J. D. Williams	H6-28	X
		B. D. Williamson	B3-15	X
		EPIC	H6-08	X