

# START

0029863

Change Number M-13-93-01 & C-93-07	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date August , 1993
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Originator R. K. Tranbarger	Phone 372-1258
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Class of Change  
 I - Signatories       II - Project Manager       III - Unit Manager

Change Title  
 Integrate 200-BP-11 Source Operable Unit and 216-B-3 Pond Work/Closure Plans

Description/Justification of Change  
 Establish New Milestone and make changes to Appendix C

Impact of Change  
 The 216-B-3 Pond System Closure/Postclosure Plan (DOE/RL-89-28, Rev. 0) was submitted in March 1990 per Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-20-09. This plan will be revised to coincide with the *Integrated 200-BP-11 Source Operable Unit and 216-B-3 Pond Work/Closure Plan*. Groundwater beneath the 200-BP-11 Operable Unit (OU) will be addressed under separate groundwater OUs as discussed in TPA Change Request C-93-06.

Affected Documents  
 Hanford Federal Facility Agreement and Consent Order, Appendix C (Prioritized Listing of OUs), and Appendix D (Work Schedule). The *216-B-3 Pond System Closure/Postclosure Plan* (DOE/RL-89-28, Rev. 0)

Approvals       Approved       Disapproved

DOE <i>[Signature]</i>	Date 8/3/93
EPA <i>[Signature]</i>	Date 8/3/93
Ecology <i>[Signature]</i>	Date 8/3/93



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TPA Changes Resulting From The Integrated 200-BP-11 Work Plan

Appendix C. Revise the 200-BP-11 "Title of Units," "Unit Type," and "Unit Category" as follows:

<u>Title of Units</u>	<u>Unit Type</u>	<u>Unit Category</u>
216-B-3-1	Ditch	RPP
216-B-3-2	Ditch	RPP
216-B-3-3	Ditch	TSD (D-2-5)
216-B-3*	Pond	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-25**	Pond	RPP
UN-200-E-14	Unplanned Release	RPP
UN-200-E-92	Unplanned Release	RPP

\* The stabilized overflow pond at the west end of the 216-B-3 Pond is considered a part of the 216-B-3 Pond.

\*\* Change Request C-92-2 will change the title of the 216-E-25 Pond to the 216-E-28 Pond when approved.

Appendix D. Add new milestone: M-13-07, Submit *Integrated 200-BP-11 Source Operable Unit and 216-B-3 Pond Work/Closure Plan* to Ecology and EPA. Due date April<sup>a</sup> 1994.

<sup>a</sup> This date will increase on a month by month basis depending on when this Change Request is signed, i.e., if the Change Request is signed in September, then the due date will be June 1994.

**ACCELERATED CORRECTIVE MEASURES FOR THE 200-BP-11 SOURCE OPERABLE UNIT**

This *Hanford Federal Facility Agreement And Consent Order* (Tri-Party Agreement) Change Request provides the justification for the prioritization of the *Integrated 200-BP-11 Source Operable Unit and 216-B-3 Pond Work/Closure Plan*. The purpose of this change request is to integrate the remediation and closure of RCRA TSD (216-B-3 Pond System) and RCRA Past-Practice waste management units (WMUs) in the 200-BP-11 OU into one work/closure plan.

This integration supports, in part, the recommendations provided in the B Plant Source Aggregate Area Management Study Report (DOE/RL-92-05, Rev. 0), Sections 9.3.2 and 9.3.4.4. The part not supported in this change request is the combination of the 200-BP-8 OU and 216-A-29 Ditch (200-PO-5) with 200-BP-11. The 200-BP-8 OU and the 216-A-29 Ditch may be added to the 200-BP-11 OU at a later date via another TPA change request if agreed upon.

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## 200-BP-11 Operable Unit Background

The 200-BP-11 OU is located in the north-eastern portion of the 200 East Area. The OU currently consists of eight WMUs and four unplanned releases, 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 eight WMUs are active RCRA TSD Units and are listed in the Tri-Party Agreement. These units are collectively referred to as the 216-B-3 Pond System and consist of the 216-B-3, -3A, -3B, and -3C Ponds and the 216-B-3-3 Ditch, and currently, all but the 216-B-3B Pond and the stabilized overflow pond contain surface water. The 216-B-3 Pond System dominates the OU waste area encompassing approximately 90 acres. The *216-B-3 Pond System Closure/Postclosure Plan*, DOE/RL-89-28 Rev. 0, was written for these units and submitted to the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) in March 1990 in compliance with Tri-Party Agreement Milestone M-20-09.

The remaining three WMUs and two of the four unplanned releases are inactive RCRA Past-Practice sites as listed in the Tri-Party Agreement. They are referred to as the 216-B-3-1 and -2 Ditches, the 216-E-28 Pond (Contingency Pond), and unplanned releases UN-200-E-14 and -92. The 216-B-3-1 and -2 Ditches discharged to the 216-B-3 Pond System 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 contaminated Russian Thistle along the 200 East Area perimeter fence and has since been removed.

Unplanned releases UPR-200-E-34 and -51 are not listed in the Tri-Party Agreement because they are contained within 200-BP-11 WMUs. Unplanned release UPR-200-E-34 occurred in 1964 as a result of a coil leak from a tank at the PUREX Plant and is contained within the 216-B-3-1 Ditch and the 216-B-3 Pond. Unplanned release UPR-200-E-51 occurred in 1977 as a result of a storage tank leak from the PUREX Plant and is contained within the 216-B-3-3 Ditch and the 216-B-3 Pond. These two unplanned releases will be discussed and effectively addressed by the *Integrated 200-BP-11 Source Operable Unit and 216-B-3 Pond Work/Closure Plan*.

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## Integrated 200-BP-11 Operable Unit and 216-B-3 Pond Work/Closure Plan Strategy

The 216-B-3 Pond System Closure/Postclosure Plan, DOE/RL-89-28 Rev. 0, defines the 216-B-3 Pond System as a group of RCRA TSD WMUs (216-B-3, -3A, -3B, & -3C Ponds, and a portion of the 216-B-3-3 Ditch) and has been written and submitted to Ecology and the EPA (Tri-Party Agreement Milestone M-20-09). The analytical results from the sampling performed under this closure plan indicate that the 216-B-3A, -3B and -3C Ponds can undergo "clean closure" under RCRA guidelines. Therefore, it is recommended that the 216-B-3 Pond and 216-B-3-3 Ditch be incorporated into the *Integrated 200-BP-11 Source Operable Unit and 216-B-3 Pond Work/Closure Plan* to integrate all future investigation, remediation, and closure activities associated with the 216-B-3 Pond System. A new Tri-Party Agreement milestone of April 1994 (see Appendix D change on pg. 2) is recommended for the submittal of the work/closure plan to Ecology and EPA.

In support of this strategy, the 200-BP-11 groundwater and source areas will be separated into different OU as recommended in the *B Plant Source Aggregate Area Management Study Report*, DOE/RL-92-05 Rev. 0, Section 9.3.2. This will allow accelerating the corrective measures for the source area while not impeding further investigation of the groundwater, if required. The 200-BP-11 groundwater investigation will be transferred to another OU (200-BP-5 and 200-PO-1) via Change Request C-93-06.

This strategy supports Tri-Party Agreement Milestone M-17-10, "Cease liquid discharges to hazardous waste land disposal units unless such units have been clean closed in accordance with RCRA," to be achieved ahead of its June 1995 due date. The milestone will be achieved by ceasing discharge of effluents to the 216-B-3-3 Ditch and the 216-B-3 Pond thus allowing the surface water to dissipate. The effluent streams are planned to be rerouted to the 216-B-3A Pond utilizing the bypass pipeline currently in place. Meanwhile, a new 216-B-3A bypass pipeline will be constructed to reroute the effluents streams to the 216-B-3B and -3C Ponds. Upon completion of the 216-B-3A Pond bypass pipeline, the effluents will be discharged solely to the 216-3B and -3C Ponds and the 216-B-3A Pond will become an inactive facility.

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