



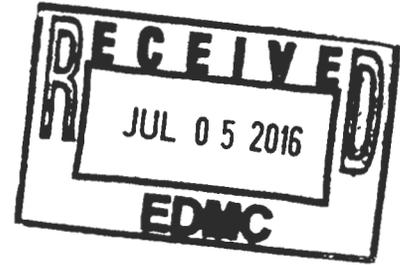
Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

1239063
[0076239H]

16-ESQ-0093

JUN 30 2016

Ms. Alexandra Smith, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354



Dear Ms. Smith:

**SUBMITTAL OF 324 BUILDING DANGEROUS WASTE MANAGEMENT UNITS
CLOSURE PLAN, DOE/RL-96-73, REVISION 4**

In accordance with the Tri-Party Agreement (TPA) Milestone M-089-06, the U.S. Department of Energy Richland Operations Office (RL) is submitting the revised document DOE/RL-96-73, Revision 4, "324 Building Dangerous Waste Management Units Closure Plan," as a Class 2 Permit Modification Request for the closure of the 324 Building Dangerous Waste Management Units. The TPA Milestone M-089-06 states the following:

"Submit to Ecology in accordance with procedures in WAC 173-303-830(4)(b), a request for a Class 2 modification to Hanford Dangerous Waste Permit, to include in the Permit the "324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated Area Closure Plan" (Closure Plan), DOE/RL-96-73 revised as necessary to address releases to the soil and to ensure compliance with requirements of WAC-173-303-610. DOE's revised closure plan will include a schedule for completing closure activities."

The permit modification includes the following attachments:

- Attachment 1: Certification Statement
- Attachment 2: Part A Form
- Attachment 3: "324 Building Dangerous Waste Management Units Closure Plan," DOE/RL-96-73, Revision 4

A 60-day public comment period will be held on the Permit Modification Request, as required by Washington Administrative Code (WAC) WAC 173-303-830(4)(b)(ii)(A). The notice required by the Permittees in WAC 173-303-830(4)(b)(ii) will be included in the appropriate Hanford Facility Agreement and Consent Order Publication or List Server, as described in Hanford Facility Resource Conservation and Recovery Act Permit Condition I.C.3. A public meeting will be held on August 24, 2016, at 5:30 p.m., per WAC 173-303-830(3)(b)(iv).

Ms. Alexandra Smith
16-ESQ-0093

-2-

JUN 30 2016

If you have any questions, please contact me, or your staff may contact Jeffrey A. Frey, Assistant Manager for Safety and Environment, on (509) 376-7727.

Sincerely,



Stacy Charboneau
Manager

ESQ:DBC

Attachments

cc w/attachs:

Laura J. Cusack, CHPRC
Suzanne L. Dahl-Crumpler, Ecology
Moses N. Jaraysi, CHPRC
Stephanie Schleif, Ecology
Jennie R. Stults, CHPRC
Administrative Record
Ecology NWP Library
Environmental Portal
HF Operating Record (J. K. Perry, MSA, A3-01)

cc w/o attachs:

Gabriel Bohnee, NPT
Rex Buck, Wanapum
Russell Jim, YN
David Rowland, YN
Rod Skeen, CTUIR

ATTACHMENT 1

**CERTIFICATION STATEMENT PAGE
FOR
HANFORD FACILITY DANGEROUS WASTE PART A PERMIT FORM
324 BUILDING DANGEROUS WASTE MANAGEMENT UNITS CLOSURE PLAN**

Consisting of 2 pages
(including this cover page.)

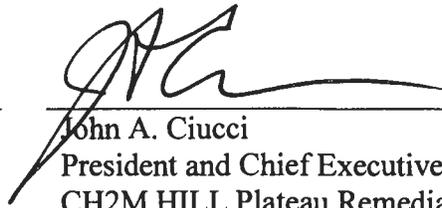
The following certification statement is provided for the Hanford Facility Dangerous Waste Part A Permit Form and the 324 Building Dangerous Waste Management Units Closure Plan.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Stacy L. Charboneau
Manager
U.S. Department of Energy
Richland Operations Office

6/30/16
Date



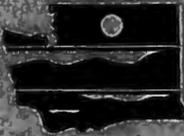
John A. Ciucci
President and Chief Executive Officer
CH2M HILL Plateau Remediation Company

6/9/16
Date

ATTACHMENT 2

HANFORD FACILITY DANGEROUS WASTE PART A FORM
324 BUILDING DANGEROUS WASTE MANAGEMENT UNITS CLOSURE PLAN

Consisting of 15 pages
(including this cover page.)

 WASHINGTON STATE DEPARTMENT OF E C O L O G Y		Dangerous Waste Permit Application Part A Form	
Date Received		Reviewed by:	
Month	Day	Year	Date
Approved by:		Date:	
I. This form is submitted to: (place an "X" in the appropriate box)			
<input checked="" type="checkbox"/>	Request modification to a final status permit (commonly called a "Part B" permit)		
<input type="checkbox"/>	Request a change under interim status		
<input type="checkbox"/>	Apply for a final status permit. This includes the application for the initial final status permit for a site or for a permit renewal (i.e., a new permit to replace an expiring permit).		
<input type="checkbox"/>	Establish interim status because of the wastes newly regulated on:		(Date)
List waste codes:			
II. EPA/State ID Number			
W	A	7 8 9 0 0 0 8 9 6 7	
III. Name of Facility			
U.S. Department of Energy - Hanford Facility			
IV. Facility Location (Physical address not P.O. Box or Route Number)			
A. Street			
Refer to Permit Attachment 2 - Hanford Facility Legal Description			
City or Town		State	ZIP Code
Near Richland		WA	
County Code (if known)	County Name		
0 0 5	Benton		
B. Land Type	C. Geographic Location		D. Facility Existence Date
	Latitude (degrees, mins, secs)	Longitude (degrees, mins, secs)	Month Day Year
F	Refer to TOPO Map (Section XV).		1 1 1 9 1 9 8 0
V. Facility Mailing Address			
Street or P.O. Box			
P.O. Box 550			
City or Town		State	ZIP Code
Richland		WA	99352

VI. Facility contact (Person to be contacted regarding waste activities at facility)												
Name (last)						(first)						
Charboneau						Stacy						
Job Title						Phone Number (area code and number)						
Manager						(509) 376-7395						
Contact Address												
Street or P.O. Box												
P.O. Box 550												
City or Town						State		ZIP Code				
Richland						WA		99352				
VII. Facility Operator Information												
A. Name										Phone Number		
U.S. Department of Energy Owner/Operator										(509) 376-7395		
CH2M HILL Plateau Remediation Company Co-operator for dangerous waste management units in the 324 Unit Group*										(509) 376-0556*		
Street or P.O. Box												
P.O. Box 550												
P.O. Box 1600*												
City or Town						State		ZIP Code				
Richland						WA		99352				
B. Operator Type		F										
C. Does the name in VII.A reflect a proposed change in operator?						<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
If yes, provide the scheduled date for the change:						Month		Day		Year		
D. Is the name listed in VII.A. also the owner? If yes, skip to Section VIII.C.						<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
VIII. Facility Owner Information												
A. Name						Phone Number (area code and number)						
U.S. Department of Energy Owner/Operator						(509) 376-7395						
Street or P.O. Box												
P.O. Box 550												
City or Town						State		ZIP Code				
Richland						WA		99352				
B. Operator Type		F										
C. Does the name in VII.A reflect a proposed change in operator?						<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
If yes, provide the scheduled date for the change:						Month		Day		Year		
IX. NAICS Codes (5/6 digit codes)												
A. First						B. Second						
5	6	2	2	1	1	9	2	4	1	1	0	Administration of Air & Water Resource & Solid Waste Management Programs

C. Third						D. Fourth												
5	4	1	7	1	2	Research & Development in the Physical, Engineering, & Life Sciences						5	6	2	9	1	0	Remediation Services

X. Other Environmental Permits (see instructions)

A. Permit Type	B. Permit Number											C. Description	
E	A	O	P	0	0	-	0	5	-	0	0	6	Air Operating Permit (AOP) ¹ see comments section.
E	A	I	R	-	0	6	-	1	0	1	4	WAC 246-247, Radiation Protection - Air Emissions ¹ see comments section.	
E	S	T	0	0	0	4	5	1	1	Misc. Streams Permit. ¹ see comments section.			

XI. Nature of Business (provide a brief description that includes both dangerous waste and non-dangerous waste areas and activities)

Process Codes

X99 - The 324 Building has six dangerous waste management units (DWMUs) that are considered Miscellaneous Units due to their unique nature and high radiation content. The 324 Building DWMUs store mixed waste residues from past research operations in four hot cells and two tank systems with associated piping. Classification of these DWMUs as miscellaneous units is necessary because the unique radiological characteristics require specialized management systems and requirements other than those applicable to tank systems. Not all stored materials contain mixed waste. Research operations have been discontinued and the facility remains under surveillance and maintenance until final deactivation and decommissioning. This will occur prior to demolition and remediation under both a *Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)* removal action and CERCLA remedial action. These CERCLA response actions will achieve closure performance standards.

Facility Description

The 324 Building was constructed in 1966 and was used for scientific research on highly radioactive materials. Research on highly radioactive materials was conducted within shielded structures known as "hot cells." The 324 Building consists of four individual hot cells (A-Cell, B-Cell, C-Cell, and D-Cell) connected by a common air lock and known collectively as the Radiochemical Engineering Cells (REC). Each of the hot cells is considered an individual DWMU (the airlock is included in the B-Cell DWMU boundary). A-Cell was not used for dangerous waste activities; therefore, there are no specific closure activities required. However, piping between B-Cell and the High-Level Vault (HLV) tanks passes under A-Cell in a crawl space and piping will be removed. C-Cell was not used for treatment, storage, and disposal activities; therefore, there are no specific closure activities required. The facility also includes two belowgrade vaults (high-level waste and low-level waste) containing tanks that collected high activity liquid effluent from the REC complex during past operations. Each of the vaults is considered a DWMU that contains a tank system. Table 1 lists all of the 324 Building DWMUs. Figure 1 locates the REC complex, HLV, and Low-Level Vault (LLV) that comprise the 324 Building DWMUs. The tanks in both vaults were flushed following deactivation and Tank 103 (LLV) and Tank 105 (HLV) have been stabilized by filling them with grout, rendering both tanks permanently inoperable. The hot cells remain functional and will be used for the CERCLA remediation of high-activity soil contamination found to exist beneath B-Cell. The rest of the 324 Facility consists of laboratories, office space, and other plant operation support structures and functions.

The dangerous waste stored in the DWMUs could include arsenic (D004), barium (D005), cadmium (D006), chromium (D007), lead (D008), mercury (D009), selenium (D010), and silver (D011).

EXAMPLE FOR COMPLETING ITEMS XII and XIII (shown in lines numbered X-1, X-2, and X-3 below): A facility has two storage tanks that hold 1200 gallons and 400 gallons respectively. There is also treatment in tanks at 20 gallons/hr. Finally, a one-quarter acre area that is two meters deep will undergo *in situ* vitrification.

Section XII. Process Codes and Design Capacities							Section XIII. Other Process Codes							
Line Number	A. Process Codes (enter code)			B. Process Design Capacity		C. Process Total Number of Units	Line Number	A. Process Codes (enter code)			B. Process Design Capacity		C. Process Total Number of Units	D. Process Description
	1	2	3	1. Amount	2. Unit of Measure (enter code)			1	2	3	1. Amount	2. Unit of Measure (enter code)		
X 1	S	0	2	1,600	G	002	X 1	T	0	4	700	C	001	In situ vitrification
X 2	T	0	3	20	E	001								
X 3	T	0	4	700	C	001								
1	X	9	9	4,630 ²	Y	006	1	X	9	9	4,487 ³	Y	004	Storage.
2							2	X	9	9	29,080	G	002	Tank Storage.
3							3							
4							4							
5							5							
6							6							
7							7							
8							8							
9							9							
1 0							1 0							
1 1							1 1							
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2 0							2 0							
2 1							2 1							
2 2							2 2							
2 3							2 3							
2 4							2 4							
2 5							2 5							

XIV Description of Dangerous Wastes

Example for completing this section: A facility will receive three non-listed wastes, then store and treat them on-site. Two wastes are corrosive only, with the facility receiving and storing the wastes in containers. There will be about 200 pounds per year of each of these two wastes, which will be neutralized in a tank. The other waste is corrosive and ignitable and will be neutralized then blended into hazardous waste fuel. There will be about 100 pounds per year of that waste, which will be received in bulk and put into tanks.

Line Number	A. Dangerous Waste No. (enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (enter code)	D. Processes											
				(1) Process Codes (enter)					(2) Process Description (If a code is not entered in D (1))						
X 1	D 0 0 2	400	P	S	0	1	T	0	1						
X 2	D 0 0 1	100	P	S	0	2	T	0	1						
X 3	D 0 0 2														Included with above
	1 D 0 0 4	189,795 ⁴	P	X	9	9									Included with above and includes debris.
	2 D 0 0 5														Included with above and includes debris.
	3 D 0 0 6														Included with above and includes debris.
	4 D 0 0 7														Included with above and includes debris.
	5 D 0 0 8														Included with above and includes debris.
	6 D 0 0 9														Included with above and includes debris.
	7 D 0 1 0														Included with above and includes debris.
	8 D 0 1 1														Included with above and includes debris.
	9														
	1 0														
	1 1														
	1 2														
	1 3														
	1 4														
	1 5														
	1 6														
	1 7														
	1 8														
	1 9														
	2 0														
	2 1														
	2 2														
	2 3														

XV. Map
 Attach to this application a topographic map of the area extending to at least one (1) mile beyond property boundaries. The map must show the outline of the facility; the location of each of its existing and proposed intake and discharge structures; each of its dangerous waste treatment, storage, recycling, or disposal units; and each well where fluids are injected underground. Include all springs, rivers, and other surface water bodies in this map area, plus drinking water wells listed in public records or otherwise known to the applicant within ¼ mile of the facility property boundary. The instructions provide additional information on meeting these requirements.

Topographic map is located in the Ecology library.

XVI. Facility Drawing
 All existing facilities must include a scale drawing of the facility (refer to instructions for more detail).

XVII. Photographs
 All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, recycling, and disposal areas; and sites of future storage, treatment, recycling, or disposal areas (refer to instructions for more detail).

XVIII. Certifications

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

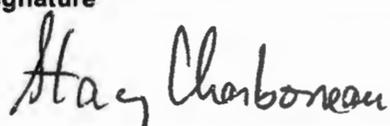
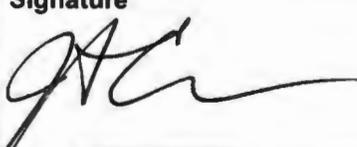
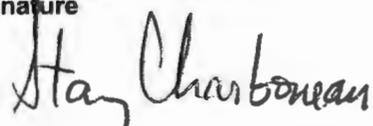
Operator Name and Official Title (type or print) Stacy L. Charboneau, Manager U.S. Department of Energy Richland Operations Office	Signature 	Date Signed 6/30/16
Co-Operator* Name and Official Title (type or print) John Ciucci President and Chief Executive Officer CH2M HILL Plateau Remediation Company	Signature 	Date Signed 6/9/16
Co-Operator* – Address and Telephone Number P.O. Box 1600 Richland, WA 99352 (509) 376-0556		
Facility-Property Owner Name and Official Title (type or print) Stacy L. Charboneau, Manager U.S. Department of Energy Richland Operations Office	Signature 	Date Signed 6/30/16

Table 1. 324 Dangerous Waste Management Units

DWMUs	Location	Operation Function
A-Cell	REC complex	Research & development with remote handled radioactive materials
B-Cell (including the pipe trench and the airlock)	REC complex	Research & development with remote handled radioactive materials
C-Cell	REC complex	Research & development with remote handled radioactive materials
D-Cell	REC complex	Research & development with remote handled radioactive materials
High-level Vault (including piping to and from REC)	Beneath cask handling area	Accumulation and transfer of high-activity process and waste liquids
Low-level Vault (including piping to and from REC)	Beneath Room 147 Hot Shop	Accumulation and transfer of low-activity process and waste liquids

Figure 1. 324 Simplified Floor Plan and Closure Boundary

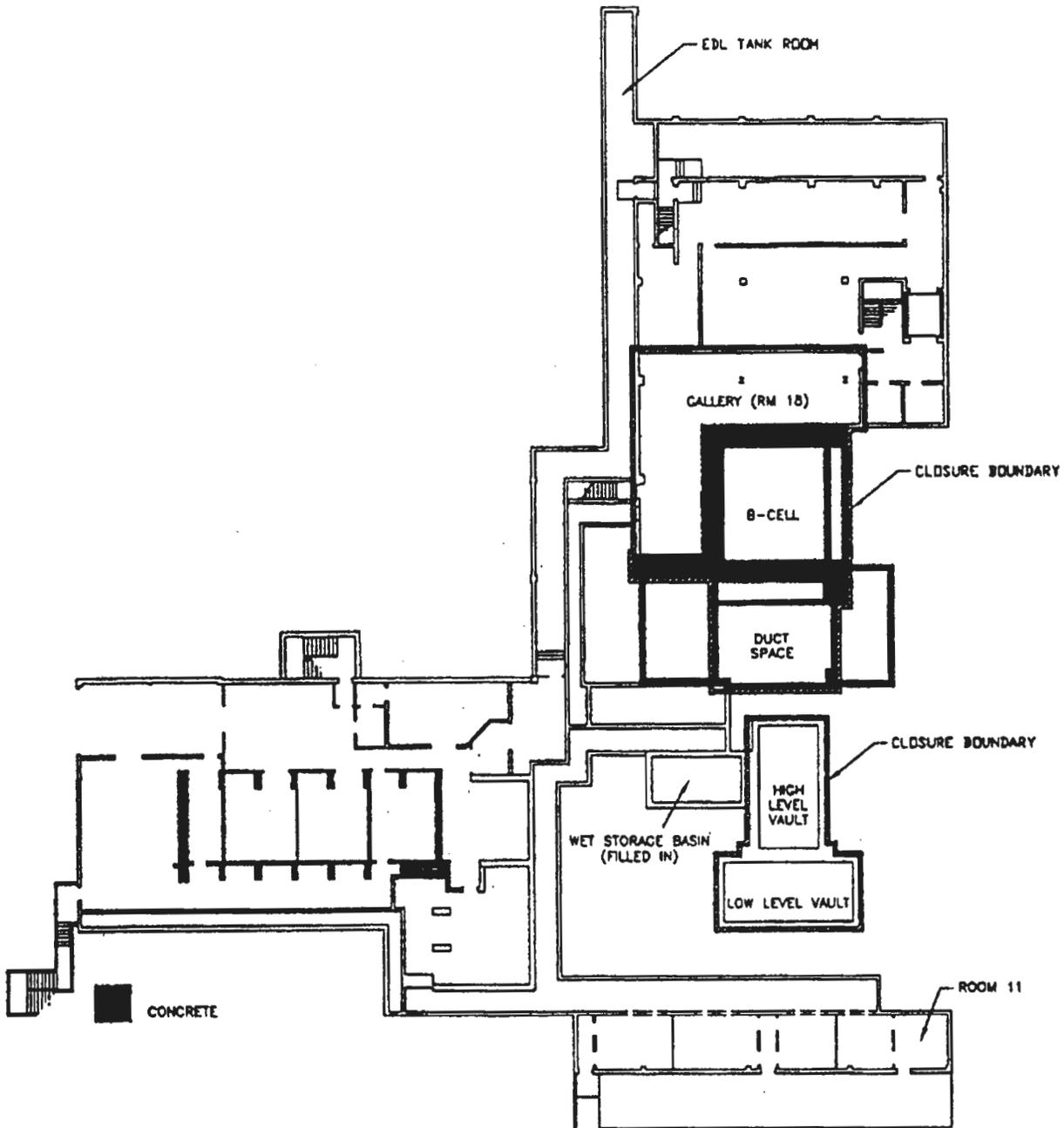


Figure 2. REC Complex Cutaway View

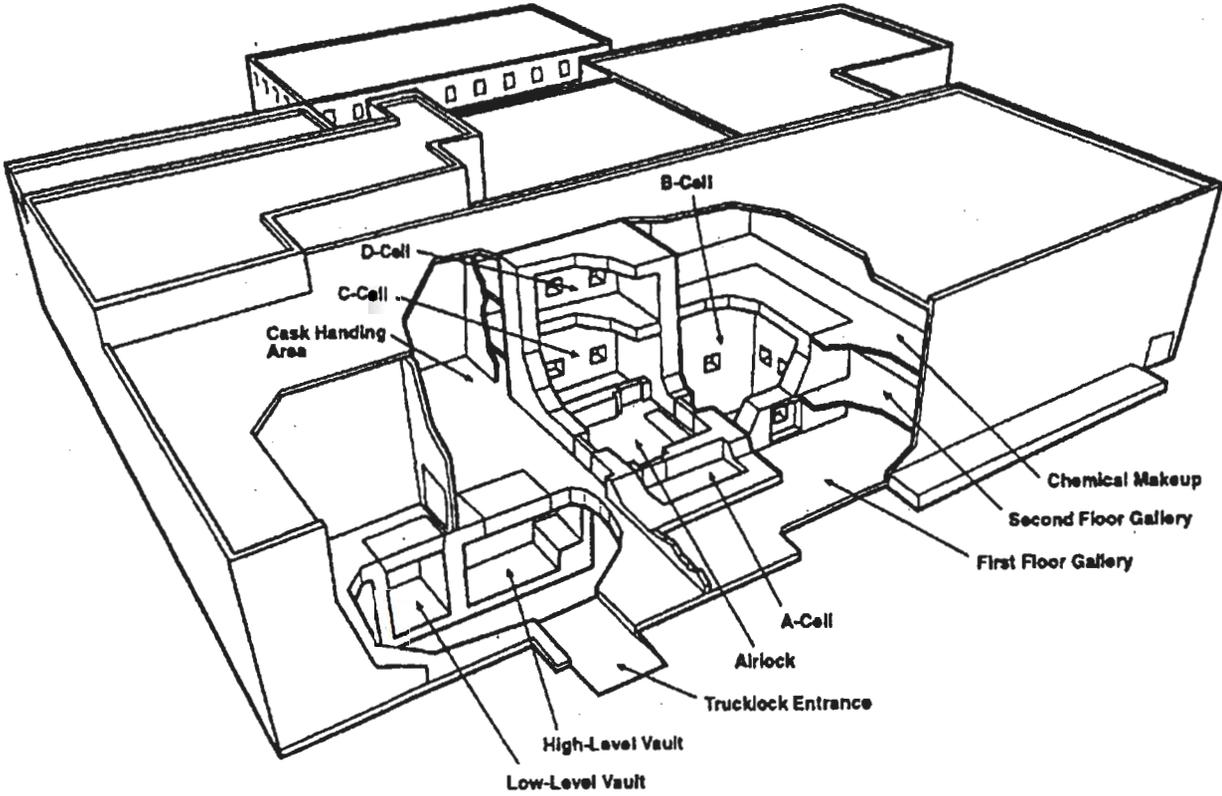
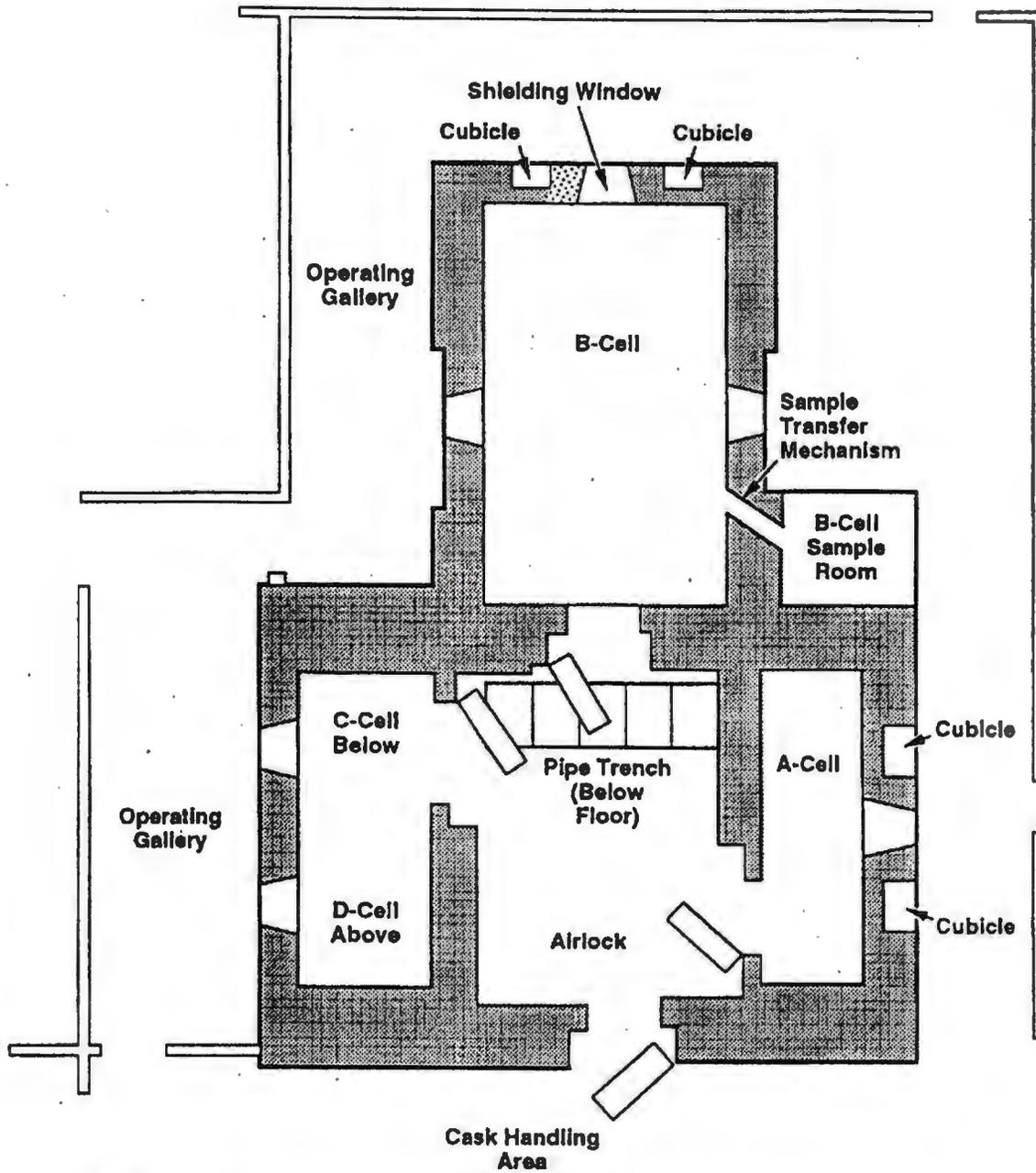


Figure 3. REC Complex Plan View



 = Concrete

Not to Scale

Note: Hot cell and airlock doors are Interlocked.
Airlock cannot be accessed when any hot cell door is open.

Figure 4. 324 Building Cross-Section Through the High-Level Vault, Low-Level Vault, Airlock, and B-Cell.

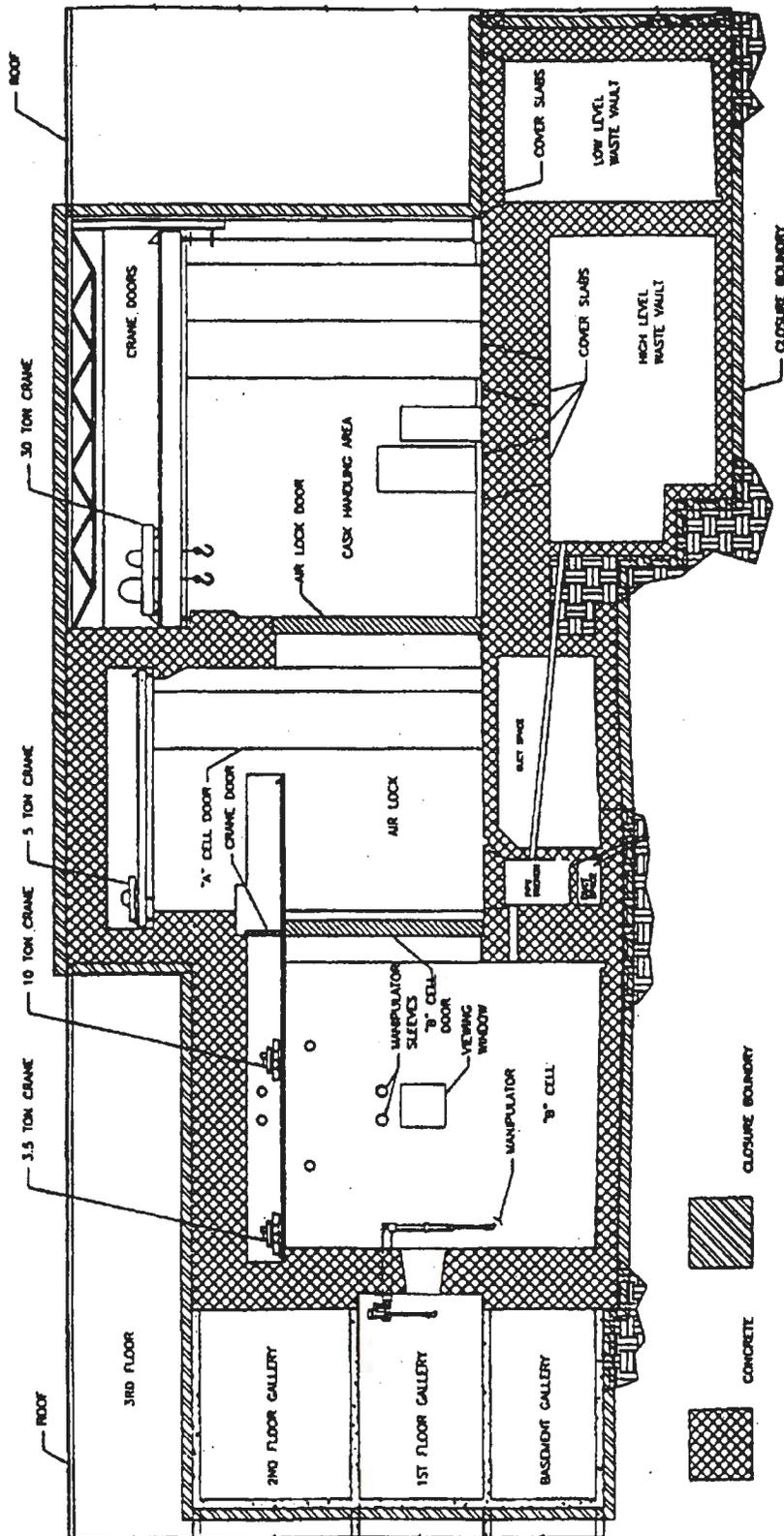
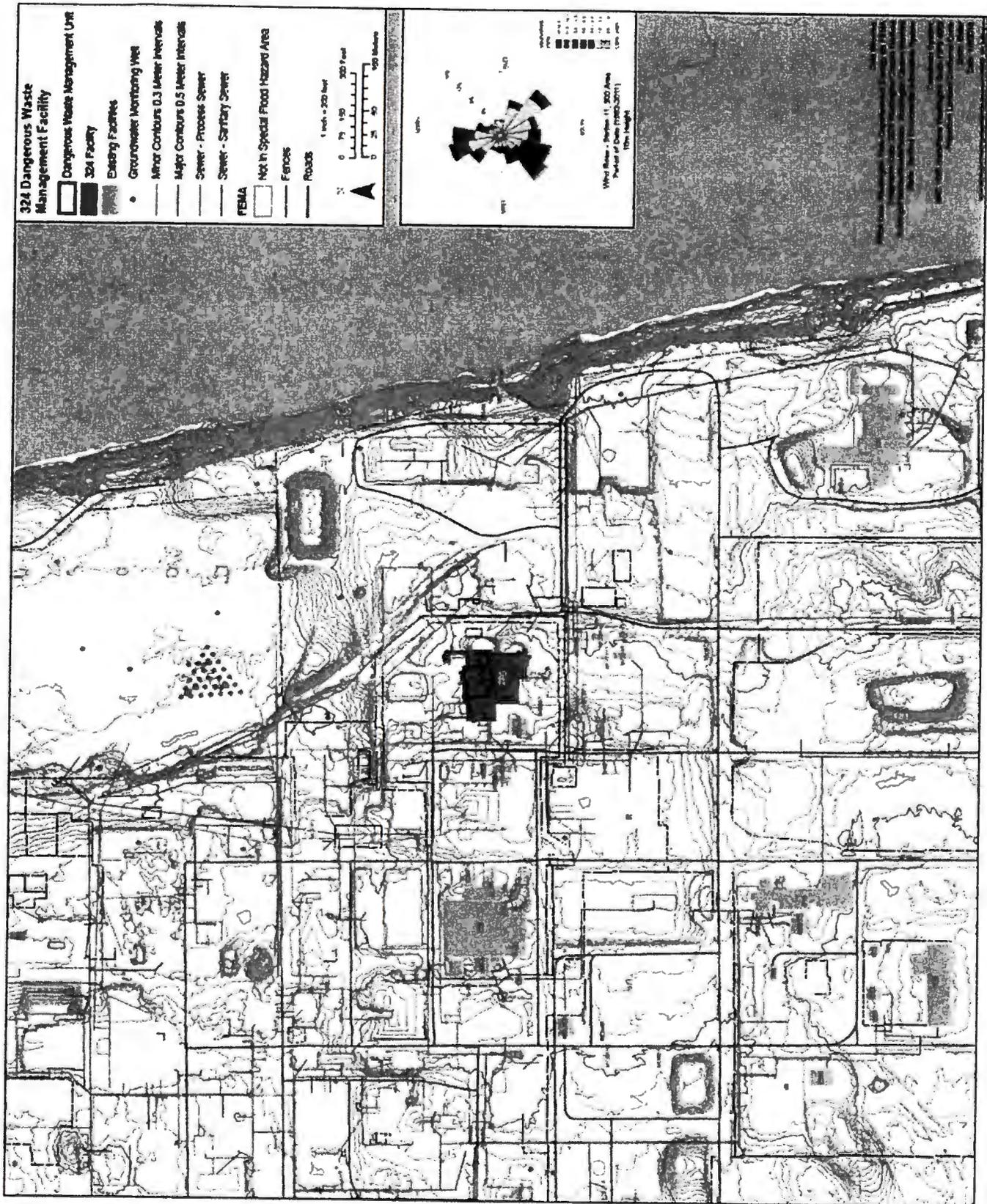


Figure 5. 324 Building Topographic Map



ATTACHMENT 3

DOE/RL-96-73, REVISION 4,
324 BUILDING DANGEROUS WASTE MANAGEMENT UNITS CLOSURE PLAN

Consisting of 56 pages
(including this cover page.)

The following certification statement is provided for the Hanford Facility Dangerous Waste Part A Permit Form and the 324 Building Dangerous Waste Management Units Closure Plan.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Stacy L. Charboneau
Manager
U.S. Department of Energy
Richland Operations Office

6/30/16

Date



John A. Ciucci
President and Chief Executive Officer
CH2M HILL Plateau Remediation Company

6/9/16

Date

Date Received for Clearance Process (MM/DD/YYYY)
06/06/2016

INFORMATION CLEARANCE FORM

A. Information Category

Abstract Journal Article
 Summary Internet
 Visual Aid Software
 Full Paper Report
 Other Closure Plan

B. Document Number DOE/RL-96-73 Revision 4

C. Title
324 Building Dangerous Waste Management Units Closure Plan

D. Proposed Internet Address

E. Required Information (MANDATORY)

1. Is document potentially Classified? No Yes
Horn, Sarah R Via IDMS Data File att.
Manager Required (Print and Sign)

If Yes ADC Required (Print and Sign) No Yes Classified

2. Official Use Only No Yes Exemption No. _____

3. Export Controlled Information No Yes OOU Exemption No. 3

4. UCNI No Yes

5. Applied Technology No Yes OOU Exemption No. 5

6. Other (Specify) _____

7. Does Information Contain the Following:

a. New or Novel (Patentable) Subject Matter? No Yes
 If "Yes", OOU Exemption No. 3
 If "Yes", Disclosure No.: _____

b. Commercial Proprietary Information Received in Confidence, Such as Proprietary and/or Inventions?
 No Yes If "Yes", OOU Exemption No. 4

c. Corporate Privileged Information? No Yes
 If "Yes", OOU Exemption No. 4

d. Government Privileged Information? No Yes
 If "Yes", Exemption No. 5

e. Copyrights? No Yes If "Yes", Attach Permission.

f. Trademarks? No Yes If "Yes", Identify in Document.

8. Is information requiring submission to OSTI? No Yes

9. Release Level? Public Limited

F. Complete for a Journal Article

1. Title of Journal _____

G. Complete for a Presentation

1. Title for Conference or Meeting _____

2. Group Sponsoring _____

3. Date of Conference _____

4. City/State _____

5. Will Information be Published in Proceedings? No Yes

6. Will Material be Handed Out? No Yes

H. Information Owner/Author/Requestor
Garcia, Erika A Approved - IDMS Data File att.
 (Print and Sign)

Responsible Manager
Horn, Sarah R Approved - IDMS Data File att.
 (Print and Sign)

Approval by Direct Report to President (Speech/Articles Only) _____
 (Print and Sign)

I. Reviewers	Yes	Print	Signature	Public Y/N (If N, complete J)
General Counsel	<input checked="" type="checkbox"/>	<u>Swenson, Raymond T</u>	<u>Y - Public, IDMS Data File att.</u>	Y / N
Office of External Affairs	<input type="checkbox"/>	_____	_____	Y / N
DOE	<input checked="" type="checkbox"/>	<u>McKarns, Tony C</u>	<u>Y - Public, IDMS Data File att.</u>	Y / N
Other	<input type="checkbox"/>	_____	_____	Y / N
Other	<input type="checkbox"/>	_____	_____	Y / N
Other	<input type="checkbox"/>	_____	_____	Y / N

J. Comments
 This document is to meet TPA Milestone requirements due to DOE June 10th. Please hold final release to IDMS pending J. Ciucci signature page insertion to final PDF.

Information Clearance Approval
APPROVED
 By Janis Aardal at 8:23 am, Jun 07, 2016

**Approved for Public Release;
 Further Dissemination Unlimited.**

```

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  Deliverable, 324 Building Dangerous WMU Closure Plan, submitted by
  Sarah Horn, for public release. Thank you, Janis Aardal Information
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324 Building Dangerous Waste Management Units Closure Plan

Prepared for the U.S. Department of Energy
Assistant Secretary for Environmental Management



P.O. Box 550
Richland, Washington 99352

324 Building Dangerous Waste Management Units Closure Plan

E. A. Garcia
CH2M HILL Plateau Remediation Company

Date Published
June 2016

Prepared for the U.S. Department of Energy
Assistant Secretary for Environmental Management

 U.S. DEPARTMENT OF
ENERGY Richland Operations
Office
P.O. Box 550
Richland, Washington 99352

APPROVED
By Janis Aardal at 6:28 am, Jun 07, 2016

Release Approval

Date

TRADEMARK DISCLAIMER

Reference herein to any specific commercial product, process, or service by tradename, trademark, manufacturer, or otherwise, does not necessarily constitute or imply its endorsement, recommendation, or favoring by the United States Government or any agency thereof or its contractors or subcontractors.

This report has been reproduced from the best available copy.

Printed in the United States of America

 WASHINGTON STATE DEPARTMENT OF ECOLOGY		Dangerous Waste Permit Application Part A Form	
Date Received		Reviewed by:	
Month	Day	Year	Date
Approved by:		Date:	
I. This form is submitted to: (place an "X" in the appropriate box)			
<input checked="" type="checkbox"/>	Request modification to a final status permit (commonly called a "Part B" permit)		
<input type="checkbox"/>	Request a change under interim status		
<input type="checkbox"/>	Apply for a final status permit. This includes the application for the initial final status permit for a site or for a permit renewal (i.e., a new permit to replace an expiring permit).		
<input type="checkbox"/>	Establish Interim status because of the wastes newly regulated on:		(Date)
List waste codes:			
II. EPA/State ID Number			
W	A	7 8 9 0 0 0 8 9 6 7	
III. Name of Facility			
U.S. Department of Energy - Hanford Facility			
IV. Facility Location (Physical address not P.O. Box or Route Number)			
A. Street			
Refer to Permit Attachment 2 - Hanford Facility Legal Description			
City or Town		State	ZIP Code
Near Richland		WA	
County Code (if known)	County Name		
0 0 5	Benton		
B. Land Type	C. Geographic Location		D. Facility Existence Date
	Latitude (degrees, mins, secs)	Longitude (degrees, mins, secs)	Month Day Year
F	Refer to TOPO Map (Section XV).		1 1 1 9 1 9 8 0
V. Facility Mailing Address			
Street or P.O. Box			
P.O. Box 550			
City or Town		State	ZIP Code
Richland		WA	99352

VI. Facility contact (Person to be contacted regarding waste activities at facility)													
Name (last)					(first)								
Charboneau					Stacy								
Job Title					Phone Number (area code and number)								
Manager					(509) 376-7395								
Contact Address													
Street or P.O. Box													
P.O. Box 550													
City or Town					State		ZIP Code						
Richland					WA		99352						
VII. Facility Operator Information													
A. Name								Phone Number					
U.S. Department of Energy Owner/Operator								(509) 376-7395					
CH2M HILL Plateau Remediation Company Co-operator for dangerous waste management units in the 324 Unit Group*								(509) 376-0556*					
Street or P.O. Box													
P.O. Box 550													
P.O. Box 1600*													
City or Town					State		ZIP Code						
Richland					WA		99352						
B. Operator Type		F											
C. Does the name in VII.A reflect a proposed change in operator?						<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No							
If yes, provide the scheduled date for the change:						Month		Day		Year			
D. Is the name listed in VII.A. also the owner? If yes, skip to Section VIII.C.						<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No							
VIII. Facility Owner Information													
A. Name								Phone Number (area code and number)					
U.S. Department of Energy Owner/Operator								(509) 376-7395					
Street or P.O. Box													
P.O. Box 550													
City or Town					State		ZIP Code						
Richland					WA		99352						
B. Operator Type		F											
C. Does the name in VII.A reflect a proposed change in operator?						<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No							
If yes, provide the scheduled date for the change:						Month		Day		Year			
IX. NAICS Codes (5/6 digit codes)													
A. First					B. Second								
5	6	2	2	1	1	Waste Treatment & Disposal	9	2	4	1	1	0	Administration of Air & Water Resource & Solid Waste Management Programs

C. Third						D. Fourth												
5	4	1	7	1	2	Research & Development in the Physical, Engineering, & Life Sciences						5	6	2	9	1	0	Remediation Services

X. Other Environmental Permits (see Instructions)

A. Permit Type		B. Permit Number										C. Description		
E		A	O	P	0	0	-	0	5	-	0	0	6	Air Operating Permit (AOP) ¹ see comments section.
E		A	I	R	-	0	6	-	1	0	1	4	WAC 246-247, Radiation Protection - Air Emissions ¹ see comments section.	
E		S	T	0	0	0	4	5	1	1			Misc. Streams Permit. ¹ see comments section.	

XI. Nature of Business (provide a brief description that includes both dangerous waste and non-dangerous waste areas and activities)

Process Codes

X99 - The 324 Building has six dangerous waste management units (DWMUs) that are considered Miscellaneous Units due to their unique nature and high radiation content. The 324 Building DWMUs store mixed waste residues from past research operations in four hot cells and two tank systems with associated piping. Classification of these DWMUs as miscellaneous units is necessary because the unique radiological characteristics require specialized management systems and requirements other than those applicable to tank systems. Not all stored materials contain mixed waste. Research operations have been discontinued and the facility remains under surveillance and maintenance until final deactivation and decommissioning. This will occur prior to demolition and remediation under both a *Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)* removal action and CERCLA remedial action. These CERCLA response actions will achieve closure performance standards.

Facility Description

The 324 Building was constructed in 1966 and was used for scientific research on highly radioactive materials. Research on highly radioactive materials was conducted within shielded structures known as "hot cells." The 324 Building consists of four individual hot cells (A-Cell, B-Cell, C-Cell, and D-Cell) connected by a common air lock and known collectively as the Radiochemical Engineering Cells (REC). Each of the hot cells is considered an individual DWMU (the airlock is included in the B-Cell DWMU boundary). A-Cell was not used for dangerous waste activities; therefore, there are no specific closure activities required. However, piping between B-Cell and the High-Level Vault (HLV) tanks passes under A-Cell in a crawl space and piping will be removed. C-Cell was not used for treatment, storage, and disposal activities; therefore, there are no specific closure activities required. The facility also includes two belowgrade vaults (high-level waste and low-level waste) containing tanks that collected high activity liquid effluent from the REC complex during past operations. Each of the vaults is considered a DWMU that contains a tank system. Table 1 lists all of the 324 Building DWMUs. Figure 1 locates the REC complex, HLV, and Low-Level Vault (LLV) that comprise the 324 Building DWMUs. The tanks in both vaults were flushed following deactivation and Tank 103 (LLV) and Tank 105 (HLV) have been stabilized by filling them with grout, rendering both tanks permanently inoperable. The hot cells remain functional and will be used for the CERCLA remediation of high-activity soil contamination found to exist beneath B-Cell. The rest of the 324 Facility consists of laboratories, office space, and other plant operation support structures and functions.

The dangerous waste stored in the DWMUs could include arsenic (D004), barium (D005), cadmium (D006), chromium (D007), lead (D008), mercury (D009), selenium (D010), and silver (D011).

EXAMPLE FOR COMPLETING ITEMS XII and XIII (shown in lines numbered X-1, X-2, and X-3 below): A facility has two storage tanks that hold 1200 gallons and 400 gallons respectively. There is also treatment in tanks at 20 gallons/hr. Finally, a one-quarter acre area that is two meters deep will undergo *in situ* vitrification.

Section XII. Process Codes and Design Capacities							Section XIII. Other Process Codes							
Line Number	A. Process Codes (enter code)			B. Process Design Capacity		C. Process Total Number of Units	Line Number	A. Process Codes (enter code)			B. Process Design Capacity		C. Process Total Number of Units	D. Process Description
	1	2	3	1. Amount	2. Unit of Measure (enter code)			1	2	3	1. Amount	2. Unit of Measure (enter code)		
X 1	S	0	2	1,600	G	002	X 1	T	0	4	700	C	001	In situ vitrification
X 2	T	0	3	20	E	001								
X 3	T	0	4	700	C	001								
1	X	9	9	4,630 ²	Y	006	1	X	9	9	4,487 ³	Y	004	Storage.
2							2	X	9	9	29,080	G	002	Tank Storage.
3							3							
4							4							
5							5							
6							6							
7							7							
8							8							
9							9							
1 0							1 0							
1 1							1 1							
1 2							1 2							
1 3							1 3							
1 4							1 4							
1 5							1 5							
1 6							1 6							
1 7							1 7							
1 8							1 8							
1 9							1 9							
2 0							2 0							
2 1							2 1							
2 2							2 2							
2 3							2 3							
2 4							2 4							
2 5							2 5							

XIV. Description of Dangerous Wastes

Example for completing this section: A facility will receive three non-listed wastes, then store and treat them on-site. Two wastes are corrosive only, with the facility receiving and storing the wastes in containers. There will be about 200 pounds per year of each of these two wastes, which will be neutralized in a tank. The other waste is corrosive and ignitable and will be neutralized then blended into hazardous waste fuel. There will be about 100 pounds per year of that waste, which will be received in bulk and put into tanks.

Line Number	A. Dangerous Waste No. (enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (enter code)	D. Processes										(2) Process Description [if a code is not entered in D (1)]						
				(1) Process Codes (enter)																
X 1	D 0 0 2	400	P	S	0	1	T	0	1											
X 2	D 0 0 1	100	P	S	0	2	T	0	1											
X 3	D 0 0 2																			Included with above
	1 D 0 0 4	189,795 ⁴	P	X	9	9														Included with above and includes debris.
	2 D 0 0 5																			Included with above and includes debris.
	3 D 0 0 6																			Included with above and includes debris.
	4 D 0 0 7																			Included with above and includes debris.
	5 D 0 0 8																			Included with above and includes debris.
	6 D 0 0 9																			Included with above and includes debris.
	7 D 0 1 0																			Included with above and includes debris.
	8 D 0 1 1																			Included with above and includes debris.
	9																			
	1 0																			
	1 1																			
	1 2																			
	1 3																			
	1 4																			
	1 5																			
	1 6																			
	1 7																			
	1 8																			
	1 9																			
	2 0																			
	2 1																			
	2 2																			
	2 3																			

XV. Map

Attach to this application a topographic map of the area extending to at least one (1) mile beyond property boundaries. The map must show the outline of the facility; the location of each of its existing and proposed intake and discharge structures; each of its dangerous waste treatment, storage, recycling, or disposal units; and each well where fluids are injected underground. Include all springs, rivers, and other surface water bodies in this map area, plus drinking water wells listed in public records or otherwise known to the applicant within 1/4 mile of the facility property boundary. The instructions provide additional information on meeting these requirements.

Topographic map is located in the Ecology library.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (refer to instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, recycling, and disposal areas; and sites of future storage, treatment, recycling, or disposal areas (refer to instructions for more detail).

XVIII. Certifications

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

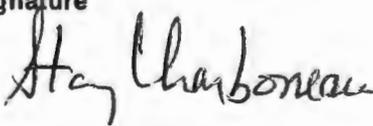
<p>Operator Name and Official Title (type or print)</p> <p>Stacy L. Charboneau, Manager U.S. Department of Energy Richland Operations Office</p>	<p>Signature</p> 	<p>Date Signed</p> <p>4/30/16</p>
<p>Co-Operator* Name and Official Title (type or print)</p> <p>John Ciucci President and Chief Executive Officer CH2M HILL Plateau Remediation Company</p>	<p>Signature</p> 	<p>Date Signed</p> <p>6/9/16</p>
<p>Co-Operator* – Address and Telephone Number</p> <p>P.O. Box 1600 Richland, WA 99352 (509) 376-0556</p>		
<p>Facility-Property Owner Name and Official Title (type or print)</p> <p>Stacy L. Charboneau, Manager U.S. Department of Energy Richland Operations Office</p>	<p>Signature</p> 	<p>Date Signed</p> <p>6/30/16</p>

Table 1. 324 Dangerous Waste Management Units

DWMUs	Location	Operation Function
A-Cell	REC complex	Research & development with remote handled radioactive materials
B-Cell (including the pipe trench and the airlock)	REC complex	Research & development with remote handled radioactive materials
C-Cell	REC complex	Research & development with remote handled radioactive materials
D-Cell	REC complex	Research & development with remote handled radioactive materials
High-level Vault (including piping to and from REC)	Beneath cask handling area	Accumulation and transfer of high-activity process and waste liquids
Low-level Vault (including piping to and from REC)	Beneath Room 147 Hot Shop	Accumulation and transfer of low-activity process and waste liquids

Figure 1. 324 Simplified Floor Plan and Closure Boundary

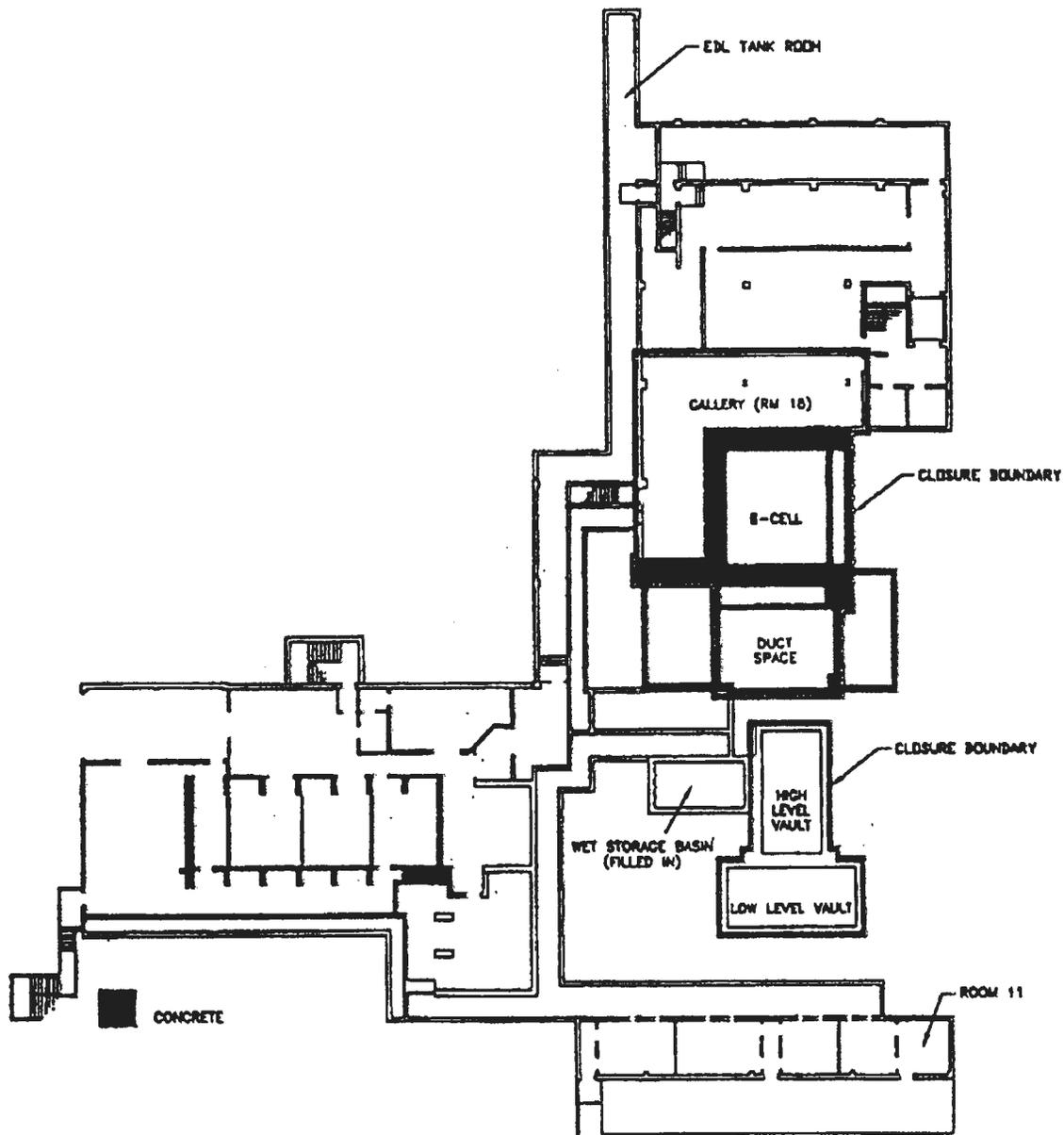


Figure 2. REC Complex Cutaway View

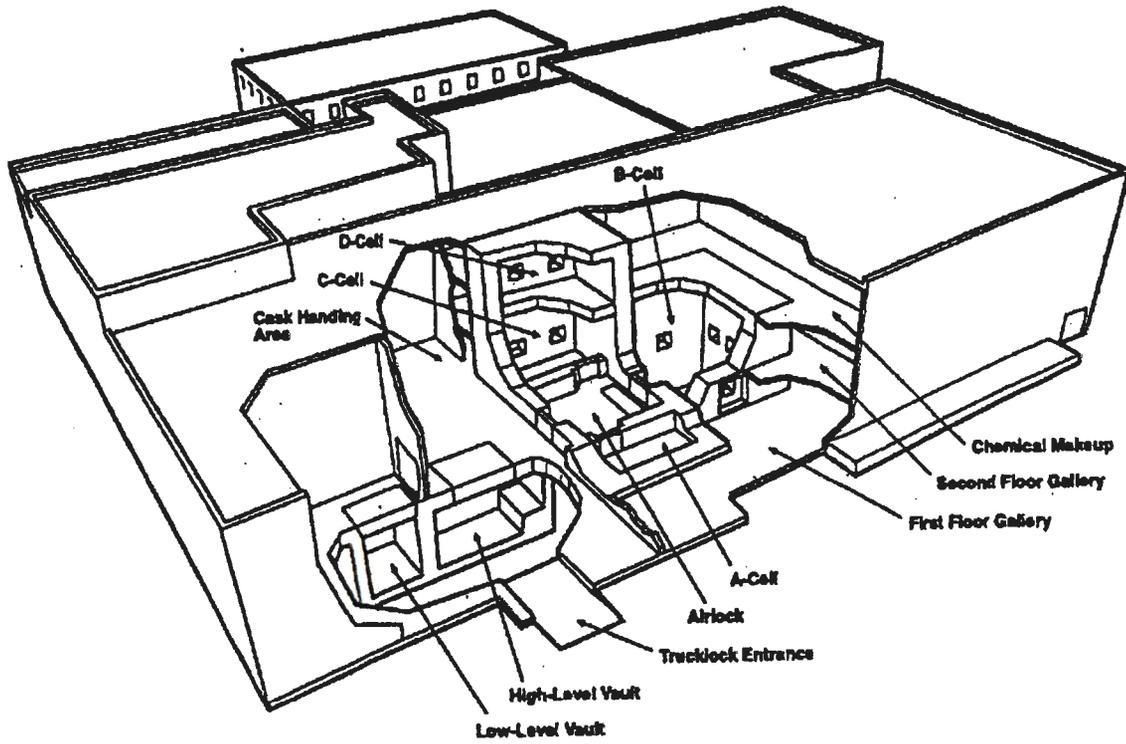
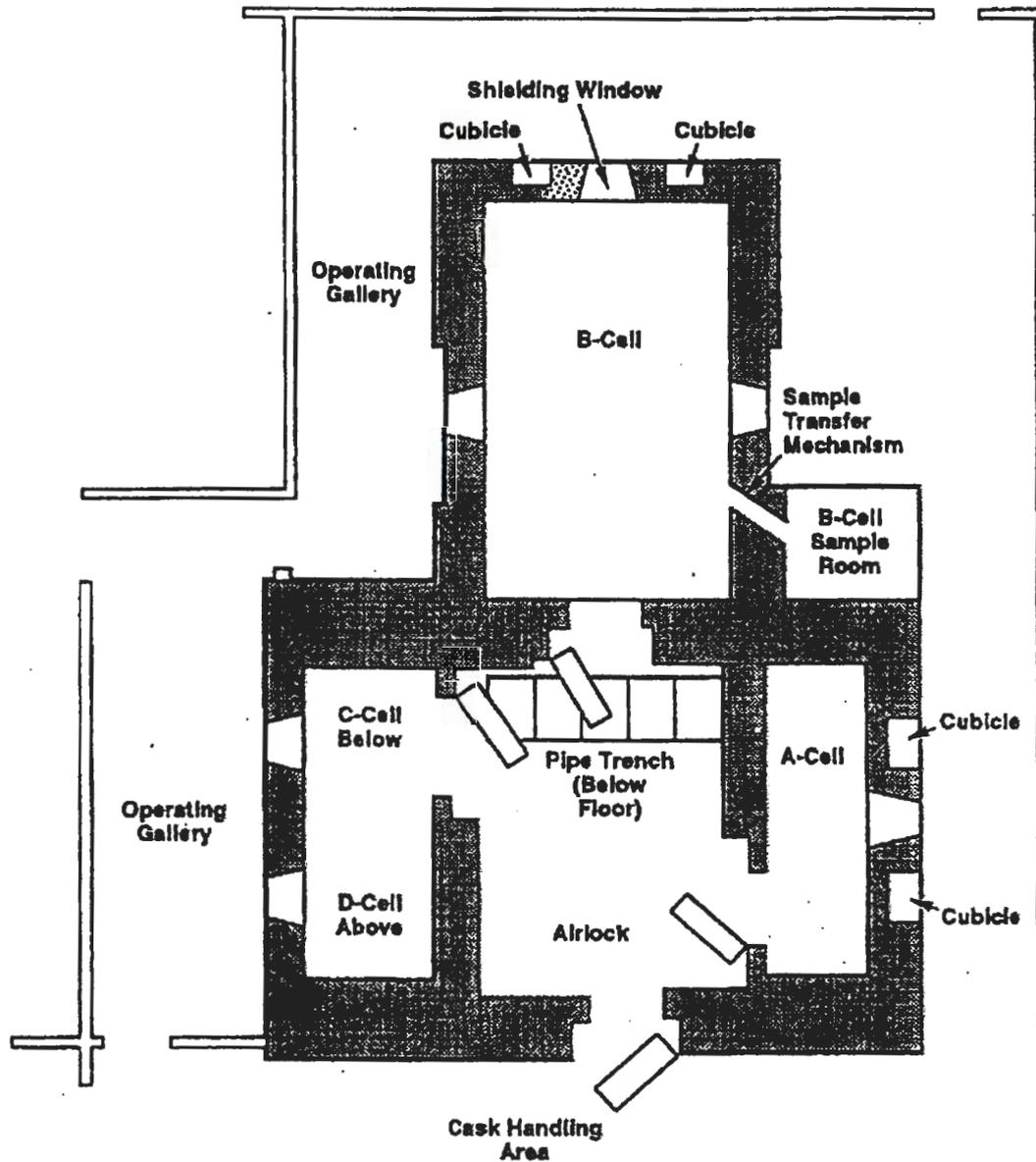


Figure 3. REC Complex Plan View



■ = Concrete

Not to Scale

Note: Hot cell and airlock doors are interlocked.
Airlock cannot be accessed when any hot cell door is open.

Figure 4. 324 Building Cross-Section Through the High-Level Vault, Low-Level Vault, Airlock, and B-Cell.

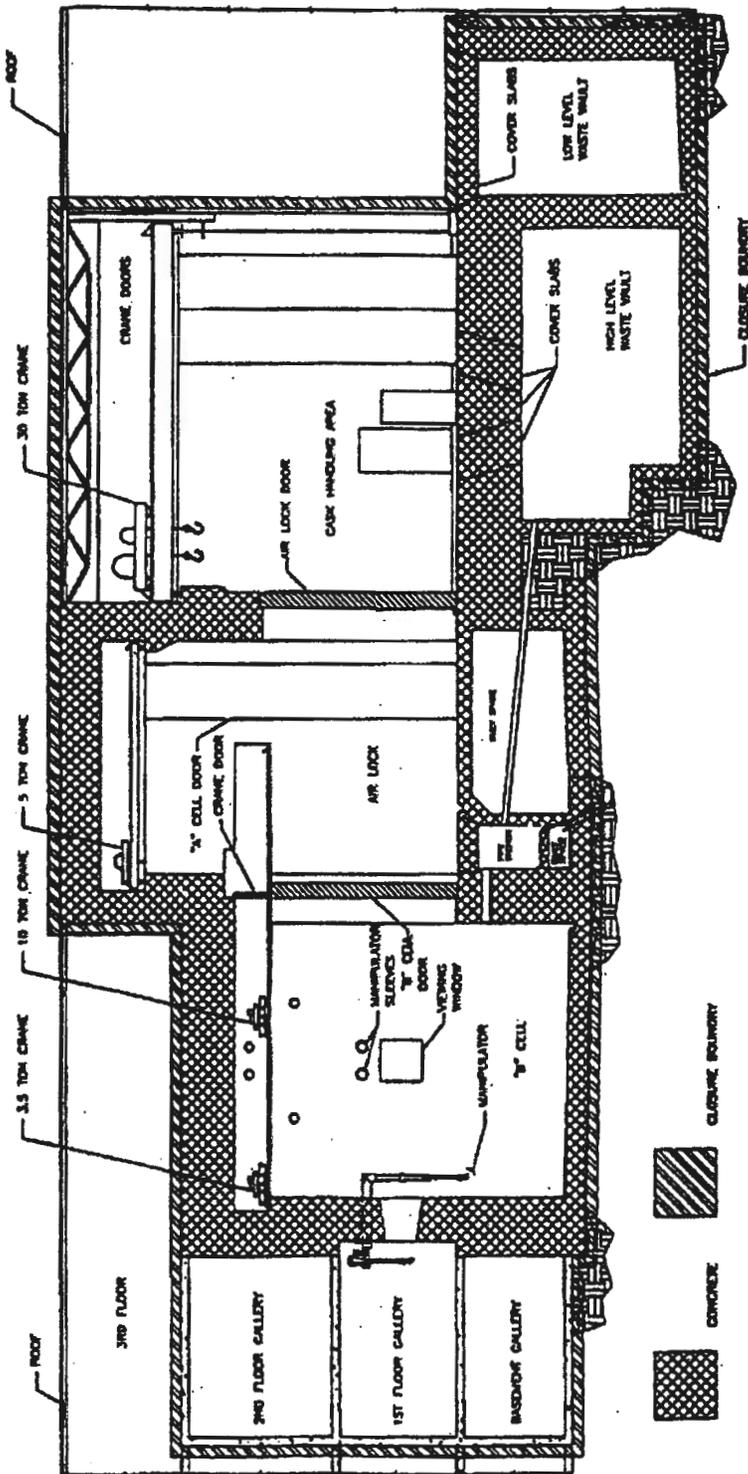
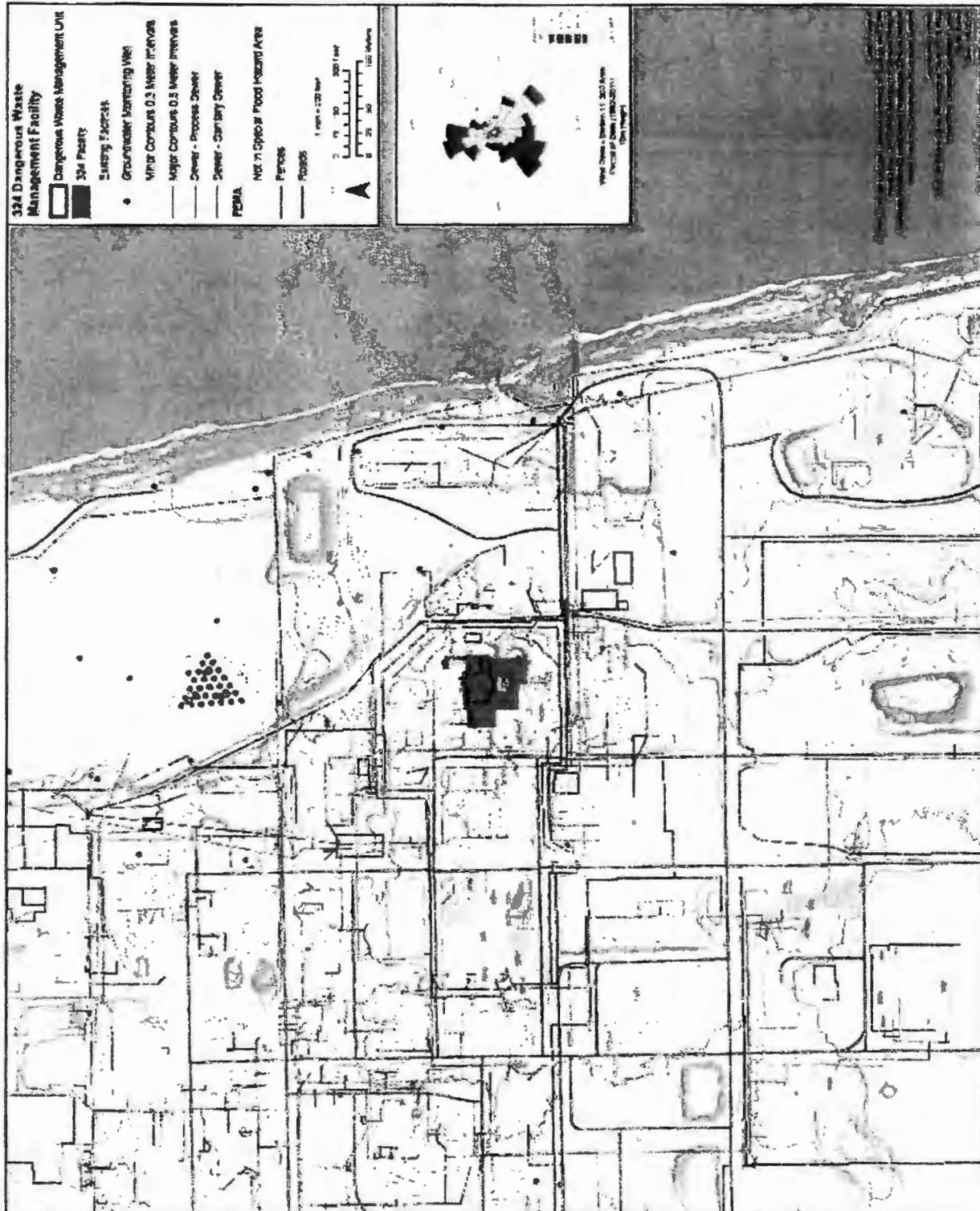


Figure 5. 324 Building Topographic Map



Permit Revision 8C

WA7890008967, Part III, Closing Unit 11
DOE/RL-96-73, Rev. 4
324 Building Dangerous Waste Management Units Closure Plan

1

Addendum H

2

Closure Plan

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Terms

2	CERCLA	<i>Comprehensive Environmental Response, Compensation, and Liability Act of 1980</i>
3	CHPRC	CH2M HILL Plateau Remediation Company
4	D4	Deactivation, Decommission, Decontamination, and Demolition
5	DOE	U.S. Department of Energy
6	DOE-RL	U.S. Department of Energy-Richland Operations Office
7	DWMU	Dangerous Waste Management Unit
8	ECO	Environmental Compliance Officer
9	EDL	Engineering Development Laboratory
10	EE/CA	Engineering Evaluation/Cost Analysis
11	EPA	U.S. Environmental Protection Agency
12	ERDF	Environmental Restoration Disposal Facility
13	GHFT	General Hanford Facility Training
14	HLV	High-Level Vault
15	IQRPE	independent, qualified, registered professional engineer
16	LDR	Land Disposal Restrictions
17	LLV	Low-Level Vault
18	NCO	Nuclear Chemical Operator
19	OT	Operations Training
20	PNNL	Pacific Northwest National Laboratory
21	QA	quality assurance
22	RCRA	<i>Resource Conservation and Recovery Act of 1976</i>
23	RDR/RAWP	remedial design report/remedial action work plan
24	REC	Radiochemical Engineering Cells
25	S&M	surveillance and maintenance
26	SMF	Shielded Materials Facility
27	TPA	Tri-Party Agreement
28	TSD	treatment, storage, and disposal
29		

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H1 Introduction

2 This addendum describes the planned activities and performance standards that meet the requirements
3 found in WAC 173-303-610(2), "Closure and Post-Closure," for closing the 324 Building Dangerous
4 Waste Management Units (DWMUs).

5 H1.1 Facility Contact Information

6 The Hanford Facility, located in southeastern Washington State, is owned by the U.S. Government and is
7 managed and operated by the U.S. Department of Energy (DOE). Dangerous waste and mixed waste
8 (containing both dangerous and radioactive components) are generated and managed at the Hanford
9 Facility. The 324 Building, which is part of the Hanford Facility, is owned by the U.S. Government and is
10 operated by DOE and its contractor, CH2M HILL Plateau Remediation Company (CHPRC). The contact
11 information is as follows:

12

13 324 Building DWMUs Operator and Property Owner

14

15 U.S. Department of Energy, Richland Operations Office
16 P.O. Box 550
17 Richland, WA 99352
18 (509) 372-2400
19

20 324 Building DWMUs Co-Operator

21

22 CH2M HILL Plateau Remediation Company
23 P.O. Box 1600
24 Richland, WA 99352
25 (509) 376-0556
26

27 H1.2 Facility Description

28 The 324 Building was constructed from 1964 to 1966 in the 300 Area of the Hanford Facility. It was
29 designed to provide office and laboratory space for scientific and engineering staff who conducted
30 multi-disciplinary research in areas of waste characterization and immobilization, waste remediation and
31 cleanup development, biomass research, spent fuel characterization, tritium development, and cesium
32 chloride encapsulation. Because the 324 Building housed research and development activities, the work
33 being conducted changed over operational years as programs were concluded and other programs started.

34 The 324 Building is a concrete and steel structure with a partial basement and first, second, and partial
35 third floors surrounding the engineering hot cell complex. Accessible floor areas total 9,450 m²
36 (101,718 ft²). The foundation structure is poured-in-place steel reinforced concrete. The roof of the
37 facility is a parapetted, slightly sloped steel deck covered with a concrete, gravel finished, built-up roof.

38 The 324 Building and its components are depicted in Figures H-1 through H-14. The 324 Building is
39 divided into four integrated but separate primary work areas: Engineering Development Laboratory
40 (EDL) -101 and EDL-102; Radiochemical Engineering Cells (REC); EDL-146; and Shielded Materials
41 Facility (SMF). The total floor area is about 6,164 m² (66,349 ft²). Maximum overall building dimensions
42 are 62.5 x 71.6 x 13.7 m (205 x 235 x 45 ft).

43 The EDL-101 and EDL-102 rooms were historically used to perform bench-to-prototype scale
44 engineering studies of waste immobilization processes with nonradioactive materials, depleted uranium,
45 and thorium. EDL-101 also was used to develop sodium and lithium cleaning processes in support of

1 development of the Fast Flux Test Facility. EDL-101 consists of a single room (originally designed as a
2 cold (i.e., nonradioactive) crafts shop to support activities in EDL-102).

3 The EDL-146 contained unshielded or mildly shielded gloveboxes for studies with extremely toxic
4 materials, tracer level fission products, and/or plutonium. Located within EDL-146 is the sampling room
5 (Room 145), which contained sampling equipment for the High-Level Vault (HLV) and Low-Level Vault
6 (LLV) tanks.

7 The REC provided for studies of chemical or mechanical processes used to further DOE's mission with
8 radiation levels of up to one million R/hr. The REC consists of four operating hot cells (A-Cell, B-Cell,
9 C-Cell, and D-Cell) surrounding a common airlock cell. The airlock functions primarily as a transition
10 zone and ventilation barrier for movement of shielded material between external areas and the four
11 processing cells. All of the cells and the airlock are equipped with overhead crane service, lead-glass
12 windows that are oil filled to facilitate viewing, and master-slave manipulators to aid remote operation
13 and maintenance of in-cell equipment.

14 The SMF includes the fabrication cell (South Cell), the airlock cell, and the feed preparation cell (East
15 Cell). Complete containment of radioactive materials, alpha, beta, and gamma, were provided for remote
16 research and fabrication studies on metallic and ceramic fuel materials with radiation levels on the order
17 of one million R/hr.

18 The cask handling area was the central hub for control of radioactive material movements within the
19 radiological areas of the 324 Building. This area is centrally located adjacent to the REC, the SMF,
20 EDL-146, and the former master-slave manipulator repair shop in Room 147 (Figure H-3). Material
21 transfers between EDL, REC, and SMF were routed through the cask handling area. Facilities existed for
22 load-in and load-out of large quantities of radioactive materials to any cell or to the shielded vault area
23 through equipment in the truck lock and cask handling areas.

24 Two shielded vaults (the HLV and LLV), containing stainless steel tanks ranging from 1,700 L (394 gal)
25 to 19,000 L (5,019 gal), provided for segregation and holding of radioactive liquid feed-stocks for, or
26 waste from, chemical processing and/or cleaning operations in the hot cells.

27 The remainder of the 324 Building consisted of offices, lunchroom, change rooms, and ancillary
28 laboratory spaces. These areas were used to provide administrative support, development laboratories,
29 maintenance shops, and common facility service and support areas. *Comprehensive Environmental*
30 *Response, Compensation, and Liability Act of 1980* (CERCLA) removal actions conducted from 2009
31 through 2011 resulted in the demolition of the 324 Building Office Annex, the cold materials testing
32 High-Bay, the 324C Lithium Enclosure, and the Mechanics Shop. These ancillary structures were
33 demolished as part of CERCLA deactivation, decommissioning, and demolition of the 324 Building per
34 the Removal Action Work Plan for 300 Area Facilities (DOE/RL-2004-77, *Removal Action Work Plan*
35 *for 300 Area Facilities*). The main portion of the 324 Building remains and is undergoing surveillance
36 and maintenance (S&M) until CERCLA demolition resumes. S&M activities include operation of the
37 ventilation system and other associated safety systems important to maintaining the 324 Building in a
38 stable configuration.

39 H1.3 Regulatory History and Background

40 In April 1993, the Washington State Department of Ecology (Ecology) and the U.S. Environmental
41 Protection Agency (EPA) were notified that the Department of Energy-Richland Office (DOE-RL) had
42 determined that the REC B-Cell and the HLV within the 324 Building were being used to manage or store
43 mixed waste. This unit was not being managed under the *Resource Conservation and Recovery Act of*
44 *1976* (RCRA); therefore, these activities did not comply with RCRA regulations, resulting in an Ecology
45 enforcement action.

46 Negotiations for resolution of the DOE-RL RCRA noncompliance were conducted among Ecology, EPA,
47 and DOE-RL using the Tri-Party Agreement dispute resolution process. On February 7, 1995, the

1 Tri-Party Agreement Dispute Resolution Committee agreed to the following: Ecology would issue a
2 Voluntary Compliance letter to document the areas of noncompliance associated with the 324 Building
3 REC and HLV, and DOE-RL, Ecology, and Pacific Northwest National Laboratory (PNNL) (co-operator
4 of the 324 Building at that time) would negotiate Tri-Party Agreement milestones to close the
5 noncompliant treatment, storage, and disposal (TSD) unit. The parties agreed that these Tri-Party
6 Agreement milestones would satisfy regulatory enforcement for the areas of noncompliance. Because of
7 radiation, storage, and shipment concerns, it was not possible to immediately remove mixed waste
8 material from the units. Radiation levels within these units are estimated to range between 1 R/hr to > one
9 million R/hr. Ecology and DOE-RL agreed that PNNL would continue managing the waste in the REC
10 and HLV in a manner appropriate for the radiological risks posed by the waste.

11 Based on the noncompliant activities and the special radiological considerations, the Tri-Party Agreement
12 Milestones signed July 28, 1995, were established to address these issues and complete closure of the
13 nonpermitted mixed waste units in the 324 Building REC and HLV, which was subsequently expanded to
14 include the LLV:

- 15 • Milestone M-89-01 identified the HLV tanks that contained liquid mixed waste as Tanks 104, 105,
16 107, and directed DOE-RL to remove the mixed waste, flush, and drain these tanks. This milestone
17 was completed in October 1996.
- 18 • Milestone M-89-02 required removal of B-Cell mixed waste and excess equipment. This milestone
19 was completed in March 2001.
- 20 • Milestone M-89-03 required compliance with interim status facility standards for the non-permitted
21 324 Building areas. Because of the high radiation fields associated with mixed waste stored in the
22 REC and HLV, alternative compliance measures for some interim status requirements were used.
23 This milestone was completed in March 1995.
- 24 • Milestone M-89-04 required DOE-RL to identify mixed waste management alternatives. This
25 milestone was completed in June 1995.
- 26 • Milestone M-20-55 required the submittal of a closure plan for the previously identified unpermitted
27 TSD unit in the 324 Building. This milestone was satisfied with the initial submittal of this closure
28 plan to Ecology in December 1995. The closure plan was subsequently modified and resubmitted in
29 May 1997. Revision 1 of the closure plan was submitted in March 1998 to resolve comments and
30 issues with the initial and subsequent closure plan, to reflect the change in building mission and
31 management, and to provide better integration of closure activities with building stabilization and
32 decontamination activities and with the CERCLA remedial actions for the 300 Area operable units.

33 The scope of Milestone M-89-00 is to complete closure of non-permitted mixed waste units in the 324
34 Building as described in this closure plan.

35 Tri-Party Agreement Change Number M-094-01-01 was approved in April 2002 and established the
36 M-094 Series Milestones and provided the overall framework for disposition of 300 Area facilities.
37 Milestones M-094-02 and M-094-03 were established by Change Number M-094-01-01, described as
38 follows.

39 Tri-Party Agreement Milestone M-094-02 was defined in Change Number M-094-01-01 as: "Submit an
40 amendment to the existing *324 Building REC/HLV Closure Plan*, DOE/RL-96-73, Rev. 1, for Ecology
41 review and approval. The amendment shall change the existing closure path from clean closure to a path
42 where the high-risk materials and wastes are removed from the facility followed by complete
43 disposition." The amendment to the closure plan was submitted to Ecology in July 2002 and was
44 approved by Ecology in December 2002. Revision 2 to the closure plan incorporated the amended change
45 in closure path and closure standard to "removal" instead of clean closure. The change in closure path was

1 approved in Revision 3 (published in August 2005). The closure performance standard was changed to
2 complete removal of each component requiring closure. Modification of the performance standard of
3 individual components was changed from clean closure in accordance with the Debris Rule “clean debris
4 surface” to “removal.”

5 In the early 2000s, the 324 Building was added to the M-094 milestone series that required disposition
6 (deactivation, decommissioning, decontamination, and demolition [D4]) of 300 Area surplus facilities
7 through the CERCLA removal action process. This included development of an engineering
8 evaluation/cost analysis (EE/CA) and action memoranda. In 2006, Action Memorandum #2 for 300 Area
9 Facilities was issued after public comment on the EE/CA by DOE-RL and EPA that required D4 of the
10 324 Building under CERCLA authority. These CERCLA decisions are implemented through the Removal
11 Action Work Plan (DOE/RL-2004-77).

12 Complete facility disposition (removal) under CERCLA will be performed in parallel with the removal
13 and closure of the mixed waste units in the 324 Building. Closure of the Milestone M-89-00 mixed waste
14 units in the 324 Building, as described in this closure plan, will be performed in parallel with the
15 complete disposition of the 324 Building. Closure activities will be conducted and certified in accordance
16 with the approved closure plan and National Priorities List Agreement/Change Control Form NPL-141,
17 signed by DOE-RL and Ecology on November 7, 2007.

18 Removal and disposal of these closure area components will be performed under CERCLA authority. All
19 wastes generated from completing the removal and remedial actions will be managed in accordance with
20 the *Removal Action Work Plan for 300 Area Facilities* (DOE/RL-2004-77), and the *Record of Decision*
21 *for 300-FF-2 and 300-FF-5 and Record of Decision Amendment for 300-FF-1* (dated November 2013, as
22 authorized by DOE-RL, EPA, and Ecology). Implementation of the Record of Decision is per
23 DOE/RL-2001-47, *Remedial Design Report/Remedial Action Work Plan for 300-FF-2 Soils*.

24 **H1.4 Current Facility Status**

25 During cleanout of B-Cell in March of 2010, a hole was discovered in the stainless steel sump liner.
26 Direct radiological measurements observed approximately 8,900 R/hr at this failed sump location. A
27 review of construction as-built drawings identified an expansion joint in the underlying concrete slab in
28 that vicinity. This prompted concerns that radiological contamination may have been released to the
29 environment from the failed sump liner. In 2011, the 324 mechanic’s shop on the north side of the
30 building was demolished and probes were inserted under the building. Radiological instruments inserted
31 into the probes recorded radiological doses in excess of 14,000 R/hr in the soil beneath B-Cell,
32 confirming that a release had occurred from B-Cell. In 2012, a soil sample of the contaminated soil was
33 retrieved and analyzed at the 325 Radiochemical Process Laboratory. The analytical data and subsequent
34 waste designation performed in accordance with WAC 173-303-070, “Designation of Dangerous Waste,”
35 confirmed the soil contamination was high-activity, low-level radioactive waste. The contaminated soils
36 beneath the building do not designate as a dangerous waste.

37 As a consequence to the release discovery, the contaminated soils were entered into the Waste
38 Information Data System as the 300-296 waste site. The *Final Record of Decision for 300-FF-2 and*
39 *300-FF-5 and Record of Decision Amendment for 300-FF-1* established 300-296 as a principle threat
40 waste site that requires remediation.

41 **H1.5 324 Building Dangerous Waste Management Units**

42 The 324 Building DWMUs consists of three basic functional areas that were integrated during past
43 research process operations—the REC (includes A-Cell, B-Cell, C-Cell, D-Cell, the airlock, and the pipe
44 trench connecting the REC with the HLV and LLV), the HLV, and the LLV. These functional areas
45 comprise the six 324 Building DWMUs: A-Cell, B-Cell (includes the pipe trench and the airlock), C-Cell,
46 D-Cell, HLV (includes piping to and from the REC), and LLV (includes piping to and from the REC).

1

2 A-Cell was not used for dangerous waste activities; therefore, there are no specific closure activities
3 required. However, piping between B-Cell and the HLV tanks passes under A-Cell in a crawl space and
4 piping will be removed. C-Cell was not used for TSD activities; therefore, there are no specific closure
5 activities required.

6 The following sections provide additional detail and status of the 324 Building DWMUs. The
7 324 Building has already undergone substantial deactivation and decommissioning under the CERCLA
8 removal action program. Numerous facility systems and components, including portions of the DWMUs,
9 have undergone shutdown, cleanout, and stabilization in preparation for demolition. The following
10 sections provide additional detail for each of the DWMU functional areas.

11 H1.6 Unit Descriptions

12 Radiochemical Engineering Cells

13 The REC (Figures H-1, H-3, and H-4) consists of four hot cells (A-Cell, B-Cell, C-Cell, and D-Cell), a
14 central airlock, and a pipe trench. The four hot cells are individual DWMUs and are joined by an airlock
15 to form a T-shaped structure. D-Cell is located above the C-Cell on the south side. C-Cell/D-Cell, the
16 airlock, and the A-Cell form the top of the T-shape. B-Cell connects to the airlock to form the bottom of
17 the T-shape. The walls are constructed of 1.2 m (3.9 ft) thick, high-density concrete or 1.4 m (4.6 ft)
18 thick, normal-density concrete. This concrete is used as containment and radiation shielding.

19 The hot cells in the REC complex provided for process engineering and testing of highly radioactive
20 materials. Operations in the REC were performed remotely. Each cell is equipped with remote/
21 mechanical manipulators; remote operated cranes; remote viewing equipment; and 1.2 m (3.9 ft) thick
22 leaded glass viewing windows, some of which are operational (i.e., filled with mineral oil), which acts as
23 an optical clarifier. The airlock functions primarily as a transition zone and ventilation barrier for the
24 transfer of highly radioactive material in shielded over-packs between the unshielded cask handling area
25 and the four shielded hot cells. At present, the REC hot cells and airlock remain operational, but have
26 undergone initial deactivation.

27 The larger A-Cell and B-Cell functioned as general purpose processing cells and were operated using
28 remote equipment from the operating galleries. A semi-remote maintenance technique grouped process
29 equipment into racks that 'plugged' into the cell walls, and allowed access to service connections on the
30 'cold' side for contact maintenance. Certain in-cell items were remotely operated and maintained using
31 direct viewing through lead-glass, oil filled windows, supplemented by closed-circuit television and
32 manipulators. Process connections were also made on the 'cold' side in a shielded pipe trench by
33 semi-remote means.

34 A-Cell is a 10 m (32.8 ft) high cell that was used most recently for storage and characterization of vitrified
35 waste in canisters and to store debris items relocated from B-Cell during terminal cleanout activities.

36 B-Cell is a 10 m (32.8 ft) high cell that was used primarily to demonstrate several engineering scale
37 prototypes of waste immobilization processes. During a further cleanout of B-Cell in 2010, a breach in the
38 containment liner was observed. B-Cell deactivated equipment and some debris were moved to adjacent
39 hot cells and the floor was stabilized with the addition of 0.3 m (1 ft) of grout (Figures H-13 and H-14
40 provide before and after photos). Some equipment used during cleanout of B-Cell remains grouted to the
41 floor.

42 The C-Cell and D-Cell are shorter process cells that were capable of handling equipment up to 3.35 m
43 (11 ft) high, and operated by direct viewing and remote/mechanical manipulators with assistance from
44 remotely operated overhead cranes. Typical processes studied in these cells were dissolution and
45 separation of fuel element compounds by high-temperature gases or liquid salt melts, de-jacketing of fuel

1 elements, remote equipment development, and determination of physical properties of highly radioactive
2 materials or equipment.

3 The REC airlock is used primarily as a transition area for transfer of material and equipment into and out
4 of the adjoining cells. The airlock is located at the junction of the arms of the REC 'T' (Figure H-3) and is
5 6.7 m (22 ft) long, 6.6 m (21.7 ft) wide, and 10 m (32.8 ft) high. The floor and the walls up to 8.2 m
6 (27 ft) high are lined with stainless steel plate welded at the seams. The airlock adjoins A-Cell (north),
7 B-Cell (west), C-Cell/D-Cell (south), and the cask handling area (east). Access to these areas is via large
8 steel doors equipped with interlocks to prevent unintended opening. The airlock is equipped with cranes
9 that facilitate remote installation, maintenance, and operation of equipment. Shielding walls are
10 constructed of 1.4 m (4.6 ft) thick, normal density concrete.

11 Access to the REC airlock is through two swinging doors, hung one above the other, sharing a single
12 opening to the cask handling area (Figure H-12). The doors are constructed of stepped steel that is at least
13 0.3 m (1 ft) thick; the lower door has a 30 cm (11.8 in.) square lead-glass shielding window. Penetrations
14 into the airlock include a cask access port, ventilation duct, manipulator sleeves, and electrical cables.
15 These services are not completely sealed but rely on the negative pressure in the airlock to limit escape of
16 contamination. Under normal operating conditions, the pressure differential between the interior and
17 exterior of the airlock creates a constant sweep of air from the cask handling area through the penetrations
18 into the airlock, thereby maintaining contamination control.

19 The pipe trench is located under the floor of the REC airlock just in front of the B-Cell door. The pipe
20 trench is 1.3 m (4.3 ft) wide and 6.4 m (21 ft) long; it varies in depth from approximately 1.8 m (6 ft) on
21 the north end to 1.6 m (5.2 ft) on the south end. Process and waste handling piping runs between the pipe
22 trench and the HLV tanks, LLV tanks, and B-Cell.

23 The pipe trench was designed to collect water used for decontamination in the REC airlock. The pipe
24 trench was equipped with a steam jet that enabled solutions collected in the trench to be transferred to
25 LLV Tank 102, but the jet ceased functioning in 1985. After that time, collected water was managed by
26 monitoring the pipe trench level, and by curtailing use of water in the airlock if levels reached an
27 administrative control level.

28 The pipe trench can be accessed by removing five 60 cm (23.6 in.) thick cover blocks using B-Cell's
29 9.1 metric ton (10.3 U.S. ton) bridge crane. The pipe trench was used to make process connections for the
30 radioactive liquids being handled by the cells and the vaults. Examples of the connections include transfer
31 lines to and from the vaults, lines to the load-out station, and lines to B-Cell. Also, various utility
32 connections (chemical addition lines, air lines, and steam lines) can be made in the pipe trench.

33 The pipe trench is lined with 0.32 m (1 ft) stainless steel plate. The pipe trench contains approximately
34 7.6 m (24.9 ft) of 12 mm (0.5 in.) pipe, approximately 210 m (689 ft) of 2.5 cm (1 in.) pipe,
35 approximately 46 m (151 ft) of 5.08 cm (2 in.) pipe, and approximately 29 m (95 ft) of 7.6 cm (3 in.) pipe.

36 In the mid-1970s, an encased inter-building transfer line (transfer piping with pipe containments) was
37 installed in the pipe trench to transfer wastes to the 325 Building and to return the processed solution to
38 the 324 Building. This transfer line will be remediated per the *Final Record of Decision for 300-FF-2 and*
39 *300-FF-5 and Record of Decision Amendment for 300-FF-1* as waste site 300-265. This line is no longer
40 operational.

41 The piping system is mostly nonoperational in the 324 Facility; the piping has not been isolated due to
42 radiological concerns. However, the radiological liquid waste system still discharges wastes to Tank 102
43 in the LLV, where the liquids are evaporated and the vapor discharged through the 324 HEPA filters to
44 the 324B Building stack.

45 High-Level Vault and Low-Level Vault

46 Two shielded underground vaults (HLV and LLV) are in the 324 Building (Figure H-1 and H-2). These
47 vaults were equipped with tanks for temporary storage of liquids. Each vault contains four stainless steel

1 tanks. These tanks were used as temporary holding tanks for feed solutions, feedstock tanks for process
2 solutions, or collection tanks for effluents from project activities.

3 The HLV is a rectangular concrete vault set under the floor of the cask handling area (Figure H-8). The
4 HLV is 6.4 m (21 ft) long, 4.0 m (13.1 ft) wide, 4.4 m (14.4 ft) deep, and is oriented in an east/west
5 direction. The west end of the vault (the end closest to the REC cells) has a ledge approximately 1.4 m
6 (4.6 ft) high that enlarges the upper level of the HLV to 8.2 m (26.9 ft) long.

7 The HLV contains four stainless steel tanks (Tanks 104, 105, 106, and 107). Tank 104 and Tank 105 are
8 on the lower level, with Tank 104 being the easternmost tank. Tanks 106 and 107 sit on the ledge, with
9 Tank 107 being the northernmost tank. The smallest tank has a capacity of approximately 1,700 L
10 (394 gal) and the largest tank has a capacity of approximately 19,000 L (5,019 gal).

11 Each tank is a cylinder with a flat top and sloped bottom (except for Tank 107, which has a concave
12 bottom) and a stainless-steel cooling jacket, although the cooling system has been deactivated. Figure H-9
13 shows typical construction of the tanks. The vault provided secondary containment for the tank systems.
14 The concrete vault is lined with seal welded 0.32 cm (0.1 in.) stainless steel plate.

15 The HLV has been filled with grout and stabilized to approximately 2.9 m (9.5 ft) deep, which still allows
16 for the operation of the ventilation system. Only Tank 105 has been internally filled with grout, rendering
17 the tank no longer operational and permanently disabled (see Figures H-9 and H-10 for before and after
18 photos). The remaining tanks are empty and inactive.

19 The LLV is a rectangular concrete vault set under the floor of Room 147. Room 147 was used for repair
20 of radioactively contaminated equipment. The vault is 8.7 m (28.5 ft) long, 4.0 m (13.1 ft) wide, and
21 5.6 m (18.4 ft) deep, and is oriented in a north/south direction.

22 The vault is covered by cover blocks (0.6 m [2 ft] thick concrete) that reveal approximately 40 percent of
23 the vault when removed from above. Beneath the cover blocks are removable steel plate ventilation
24 barriers. The LLV is connected via a short tunnel to the HLV near the top of the vaults in the southern
25 interconnecting wall. The vaults share the same air space, which was vented to the low pressure side of
26 the A-frame air filter bank from the HLV.

27 The LLV contains four stainless steel tanks (Tanks 101, 102, 103, and 108) shown in Figure H-11. All
28 tanks have cooling jackets, which enabled circumferential heating and cooling of the tanks. The vault
29 provided secondary containment for the tank systems. The concrete vault is lined with seal welded
30 0.32 cm (0.1 in.) stainless steel plate.

31 The LLV has been filled with grout and stabilized to approximately 2.9 m (9.5 ft) deep, which still allows
32 for the operation of the ventilation system. Only Tank 103 has been internally filled with grout, rendering
33 the tank no longer operational and permanently disabled. Tanks 101 and 108 remain empty and inactive.
34 Tank 102 is currently used as a backup tank for any overflow from the sump located in Room 4. The
35 sump is used to collect any water from the building. Both the sump and tank have operational level-fill
36 indicators and high-level alarms.

37 H1.7 Mixed Waste Inventory

38 Mixed waste stored in the 324 Building DWMUs are conservatively designated as the following
39 dangerous waste components: arsenic (D004), barium (D005), cadmium (D006), chromium (D007), lead
40 (D008), mercury (D009), selenium (D010), and silver (D011). These heavy metals are associated with
41 residual contaminants or in debris form (e.g., lead brick).

42 The 'estimated annual quantity of waste' listed in Addendum A, Part A, is an estimated mass based on
43 residual contaminants remaining in contaminated structure surfaces to 2.5 cm (1 in.) in depth, residual
44 within process piping, and on cell floors and walls. The amount includes specific known mass for discrete
45 waste items located in the REC complex as well. Reference Addendum A, Part A, for additional
46 information.

1 H1.8 Closure Performance Standards

2 The 324 Building DWMUs closure boundary remains the same as that described and approved in the 324
3 *Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated Areas*
4 *Closure Plan*, DOE/RL-96-73, Revision 3. Closure performance standards and closure will be achieved
5 through the physical removal of the REC, HLV, LLV, and associated piping. Removal is to include 0.5 m
6 (1.6 ft) of soil beneath the DWMUs. This meets the closure performance standards requirements in
7 WAC 173-303-610(2), which requires closure of the facility in a manner that accomplishes the following
8 objectives:

- 9 • Minimizes the need for further maintenance
- 10 • Controls, minimizes, or eliminates to the extent necessary to protect human health and the
11 environment, post-closure escape of dangerous waste, dangerous constituents, leachate, contaminated
12 runoff, or dangerous waste decomposition products to the ground, surface water, groundwater, or the
13 atmosphere
- 14 • Returns the land to the appearance and use of surrounding land areas, to the degree possible, given the
15 nature of the previous dangerous waste activity

16 Soil contamination will be addressed during CERCLA remediation of the 300-296 waste site in
17 accordance with *Final Record of Decision for 300-FF-2 and 300-FF-5 and Record of Decision*
18 *Amendment for 300-FF-1*.

19 H1.9 Closure Activities

20 Closure performance standards and closure will be achieved as part of a four-phase process implementing
21 both RCRA closure activities and CERCLA removal and remedial actions. The four phases are described
22 as follows with RCRA closure of the DMWUs being achieved during Phase 3.

23 **Phase 1** consists of completing through-cell retrieval of the high-activity radioactive soils underlying
24 B-Cell. Because of the remote handled nature of the soil contamination, retrieval will consist of installing
25 remotely operated equipment and tools into B-Cell and using the cell as shielding. Equipment will be
26 used to remove the B-Cell liner and floor slab and package the debris for relocation into the adjacent hot
27 cells (A, C, and D) or for removal from the building for shipment and disposal at ERDF in compliance
28 with the ERDF waste acceptance criteria (ERDF WAC). Following removal of the floor, the same
29 equipment will be used to excavate and package the contaminated soils to a depth of approximately 3 to
30 4 m (13.1 ft) beneath the B-Cell floor. Packaged soil will either be relocated into the adjacent hot cells or
31 removed from the building for shipment and disposal at ERDF. The target depth of excavation is intended
32 to reduce dose rates to those acceptable in order to complete remediation of remaining contaminated soils
33 using conventional excavation means. Because space to accept waste in the adjacent hot cells is limited
34 and less than the projected volume of material to be excavated beneath B-Cell, dose rate considerations
35 will be used to determine which materials are placed in the adjacent hot cells and which are removed from
36 the building. Higher dose rate material will be given preference for relocation into the adjacent hot cells
37 over lower dose rate materials.

38 Following completion of through-cell retrieval, the excavation beneath B-Cell will be backfilled with
39 stabilizing agents such as grout or controlled density fill (i.e., self-leveling grout). As part of the later
40 removal action, void spaces remaining in the hot cells will be filled with grout to stabilize the cell
41 contents and provide stability for hot cell removal. Facility systems will remain operational during this
42 phase of the project.

43 **Phase 2** consists of deactivation of the 324 Building and associated operating systems (e.g., shutdown of
44 the ventilation and fire suppression systems). Following deactivation utility isolations, hazardous material
45 removal will be performed as part of preparations for demolition. Demolition during Phase 2 will consist

1 of removing the outer building structure and ancillary facilities from around the REC and vaults to a
2 slab-on-grade configuration. Removal of the 324 Building stack may be sequenced with or after Phase 3.
3 Phase 2 is intended to remove physical interferences necessary for initiation of Phase 3.

4 **Phase 3** consists of removal of the REC and HLV and LLV structures. Portions of the facility will
5 undergo monolithic removal, which will entail cutting the hot cells/vaults into large waste forms for
6 removal as single-piece objects. The cuts through the hot cells will limit disturbance of highly
7 contaminated areas to include waste generated from through-cell retrieval of 300-296 soils. All packages
8 will meet the ERDF WAC. Closure performance standards and closure that includes removal of the REC,
9 HLV, LLV, associated piping, and 0.5 m (1.6 ft) of soil will be achieved at the completion of Phase 3. At
10 the completion of Phase 3, only non-DWMU portions of the 324 Building foundation and residual soil
11 contamination may remain. Removal of the 324 Building as part of Phase 4 may be sequenced with or
12 after Phase 3.

13 **Phase 4** consists of completing demolition of the remaining 324 Building foundation per the Removal
14 Action Work Plan (DOE/RL-2004-77) and excavation of residual contaminated soils associated with the
15 300-296 waste site. Completion of remediation of the 300-296 waste site will achieve 300-FF-2 operable
16 unit CERCLA remedial action goals and remedial action objectives that include closure verification
17 sampling in accordance with the remedial design report/remedial action work plan (RDR/RAWP)
18 (DOE/RL-2001-47) and 300-FF-2 operable unit Sampling and Analysis Plan (DOE/RL-2001-48).
19 Following demonstration that cleanup levels have been achieved, the remaining excavation from
20 demolition and remediation will be backfilled to grade and revegetated.

21 **H1.9.1 Training Requirements**

22 The Permittees have instituted training or qualification programs to meet training requirements imposed
23 by regulations, DOE orders, and national standards. For example, the environmental, safety, and health
24 training program provides workers with the knowledge and skills necessary to execute assigned duties in
25 accordance with the regulations. WA 7890008967, *Hanford Facility Resource Conservation and Recovery*
26 *Act Permit* (hereinafter called the Hanford Facility RCRA Permit), Attachment 5, "Hanford Facility
27 Personnel Training Program," describes specific requirements for the Hanford Facility personnel. The
28 Permittees will comply with the training matrix shown in Table H-1, which provides training
29 requirements for Hanford Facility personnel associated with the 324 Building.

30 Project-specific training addressed explicitly to the project and the day's activity will include
31 the following:

- 32 • Training will provide the knowledge and skills needed for personnel to perform work in accordance
33 with quality assurance (QA) requirements.
- 34 • Personnel are required to be qualified in the type of work being performed in the field.

Table H-1. Training Matrix for 324 Building DWMUs

Training Category Course Description ^a	Frequency of Training	Training Type ^b	Job Title/Position				
			Non-Personnel or Visitor	Operation Supervisor	Waste Service Provider	NCO	ECO
Facility Health and Safety	Annual	GHFT, CPT	X ^c	X	X ^c	X	X

a. See the 324 Facility DWTP for a complete description of coursework in each training category.

b. Training types defined in the WA7890008967, *Hanford Facility Resource Conservation and Recovery Act Permit*, Attachment 5, "Hanford Facility Personnel Training Program."

c. This training is required only if workers are unescorted in the facility.

- CPT = Contingency Plan Training NCO = Nuclear Chemical Operator
- DWTP = Dangerous Waste Training Plan OT = Operations Training
- ECO = Environmental Compliance Officer
- GHFT = General Hanford Facility Training

1

2 **H1.9.2 Removal of Wastes and Waste Residues**

3 The DWMUs in the 324 Building are assumed to contain mixed low-level waste. Dangerous waste or
4 waste residues are attached to surplus equipment and to walls and liners in the hot cells. The DWMUs
5 will be maintained in accordance with the Removal Action Work Plan (DOE/RL-2004-77) in a manner
6 that demonstrates that all steps have been taken and will continue to be taken to prevent threats to human
7 health and the environment from the unclosed DWMUs. Due to the complexity and significant
8 radiological contamination associated with the 324 Building DWMUs, entry to the hot cells and vaults.
9 S&M activities may be performed in concert with deactivation and decommissioning of the 324 Building.

10 The objectives of the S&M are to ensure adequate containment of any contaminants left in place (both
11 dangerous wastes and radiological), to provide physical safety and security controls, and maintain the
12 building in a manner that will present no significant risk to human health or the environment until final
13 disposition is complete. This approach is consistent with the requirements in the Removal Action Work
14 Plan (DOE/RL-2004-77). S&M activities include the following activities of Section 2.0 of the Removal
15 Action Work Plan (DOE/RL-2004-77):

- 16 • **Facility Maintenance** - Preventive maintenance activities for any remaining active systems will be
17 performed.
- 18 • **Facility Surveillance** - Routine walkdowns will be performed to look at general condition and the
19 status of any remaining active systems (e.g., lighting, emergency power).
- 20 • **Safeguards and Security** - The 324 Building will have limited access as described in the Removal
21 Action Work Plan (DOE/RL-2004-77).

22 **H1.9.3 Inspection of Units before Decontamination**

23 To prevent threats to human health and the environment during the closure period, the 324 Building
24 DWMUs will be inspected in accordance with WAC 173-303-320(2), "General Inspection." Inspections
25 of the 324 Building DWMUs will be performed annually, until the closure certification is approved by
26 Ecology, and will verify the following:

- 1 • Posted warning signs at each entrance to the 324 Building are present, legible, and visible at 7.6 m
2 (25 ft).
- 3 • No evidence of unusual conditions exists at the closing DWMUs.

4 **H1.9.4 Decontamination**

5 All decontamination activities will be conducted during waste removal activities in accordance with the
6 *Remedial Design Report/Remedial Action Work Plan for 300-FF-2 Soils (DOE/RL-2014-13-ADD 1)*.

7 **H1.9.5 Identifying and Managing Contaminated Environmental Media**

8 Closure of the six 324 Building DWMUs will be the removal of the REC, HLV, and LLV structures and
9 associated piping potentially contaminated with mixed waste. Soil remediation will be addressed through
10 the 300 CERCLA soil remediation activities.

11 All the disposed mixed waste must meet the Land Disposal Restrictions (LDR) treatment standards
12 according to WAC 173-303-140, "Land Disposal Restrictions," incorporating 40 CFR 268, "Land
13 Disposal Restrictions." Surplus equipment waste may be treated as debris using Alternative Treatment
14 Standards specified in 40 CFR 268.45 Table 1, "Alternative Treatment Standards for Hazardous Debris"
15 (incorporated by WAC 173-303-140(2)(a)). This applies to all equipment disposed and grouted in the
16 B-Cell and D-Cell as well as the vault tanks and pipes. Liners and walls in the hot cells that are assumed
17 to have mixed waste on the surfaces (such as the B-Cell walls) will be treated through the application of a
18 surface coating. This is an Alternative Treatment Standard as specified in 40 CFR 268.45 Table 1
19 (incorporated by WAC 173-303-140(2)(a)). All waste management activities will be completed per the
20 Removal Action Work Plan (DOE/RL-2004-77).

21 **H1.9.6 Role of the Independent Qualified Registered Professional Engineer**

22 An independent, qualified, registered professional engineer (IQRPE) will be retained to provide
23 certification of the closure, as required by WAC 173-303-610(6). The IQRPE will be responsible for
24 observing field activities and reviewing documents associated with closure of the 324 Building DWMUs.
25 At a minimum, the following field activities would be completed:

- 26 • Review of documentation of the grouted DMWUs
27 • Visual verification of the DWMUs removal
28 • Observe and/or review waste disposal documentation
29 • Verification that closure activities were performed in accordance with this closure plan.

30 The IQRPE will record his or her observations and reviews in a written report that will be retained in the
31 operating record. The resulting report will be used to develop the closure certification, which will then be
32 provided to Ecology.

33 **H1.9.7 Certification of Closure**

34 As noted in the proceeding section, RCRA closure will be achieved at the end of Phase 3. In accordance
35 with WAC 173-303-610(6), within 60 days of completing closure activities for the 324 Building
36 DWMUs, certification that closure activities have been completed in accordance with the approved
37 closure plan will be submitted to Ecology by registered mail or other means that establish proof of receipt
38 (including applicable electronic means). The certification will be signed by the owner or operator and
39 signed and stamped by an IQRPE. Supporting information may be submitted upon request by Ecology.

40 **H1.9.8 Conditions That Will Be Achieved When Closure Is Complete**

41 Upon confirmation of RCRA closure of the 324 Building DWMUs, the remaining remediation work will
42 be completed under the *Final Record of Decision for 300-FF-2 and 300-FF-5 and Record of Decision*
43 *Amendment for 300-FF-1* Section 12.5.

1 **H1.10 Closure Schedule and Duration**

2 As shown in the following text and in Table H-2, the total duration of the four phases of the 324 Building
3 closure project will encompass seven years once planning activities are completed. Durations for each
4 phase as follows:

5 Phase 1 – through-cell retrieval = ~22 months

6 • Removal of grout and debris from B-Cell = ~1.75 months

7 • Readiness = ~1.5 months

8 • B-Cell floor removal = ~1.5 months

9 • B-Cell primary zone soil removal = ~12 months

10 • B-Cell secondary zone soil removal = ~5 months

11 • Backfill waste site = ~0.25 months

12 Phase 2 – deactivation and demolition = ~30 months

13 Phase 3 – cell and vault removal = ~19 months

14 Phase 4 – final remediation and backfill of 300-296 = ~15 months

15

16 **H1.11 Closure Costs**

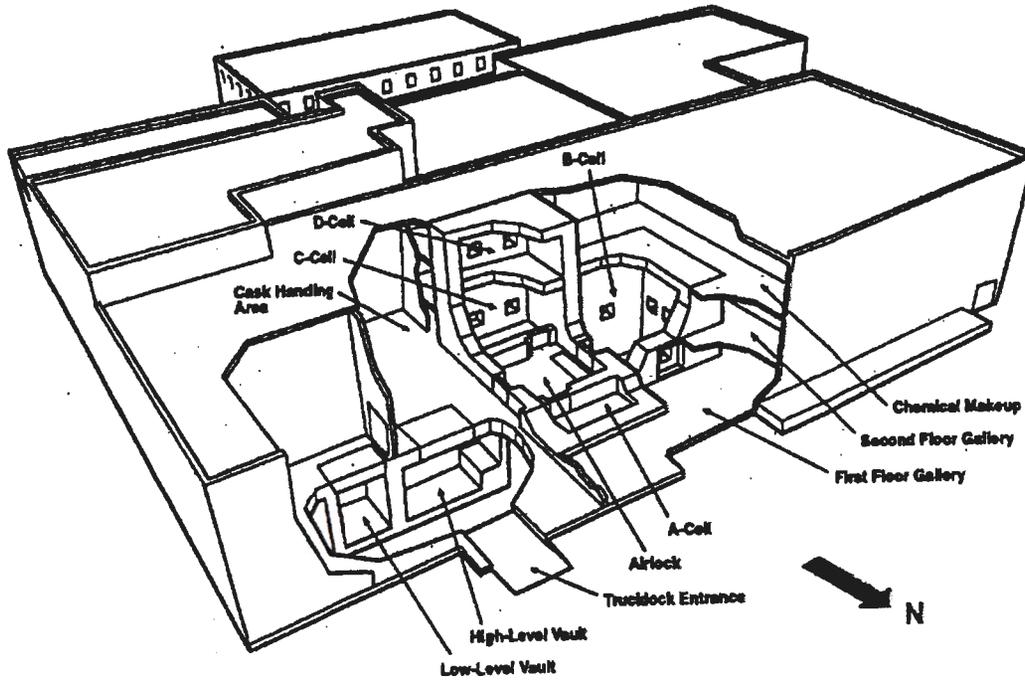
17 A detailed written estimate outlining updated projections of anticipated closure costs for the Hanford
18 Facility TSD units is not required per Permit Condition II.H.

Table H-2. Closure Activity Schedule

Closure Schedule Durations							
Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8
Phase 1							
	Phase 2						
				Phase 3			
						Phase 4	

Note: Closure of the DMWUs will be achieved at the end of Phase 3.

1



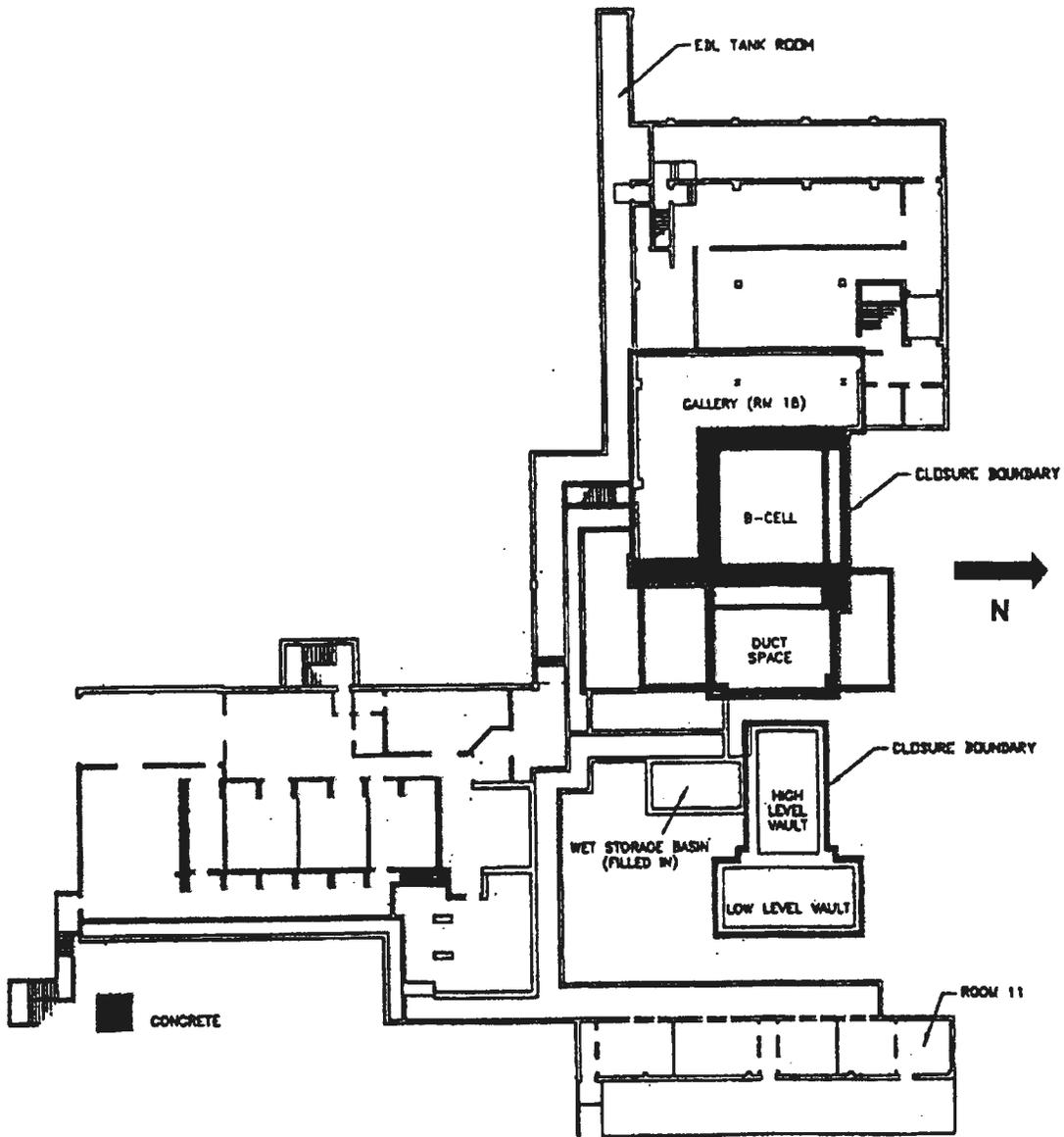
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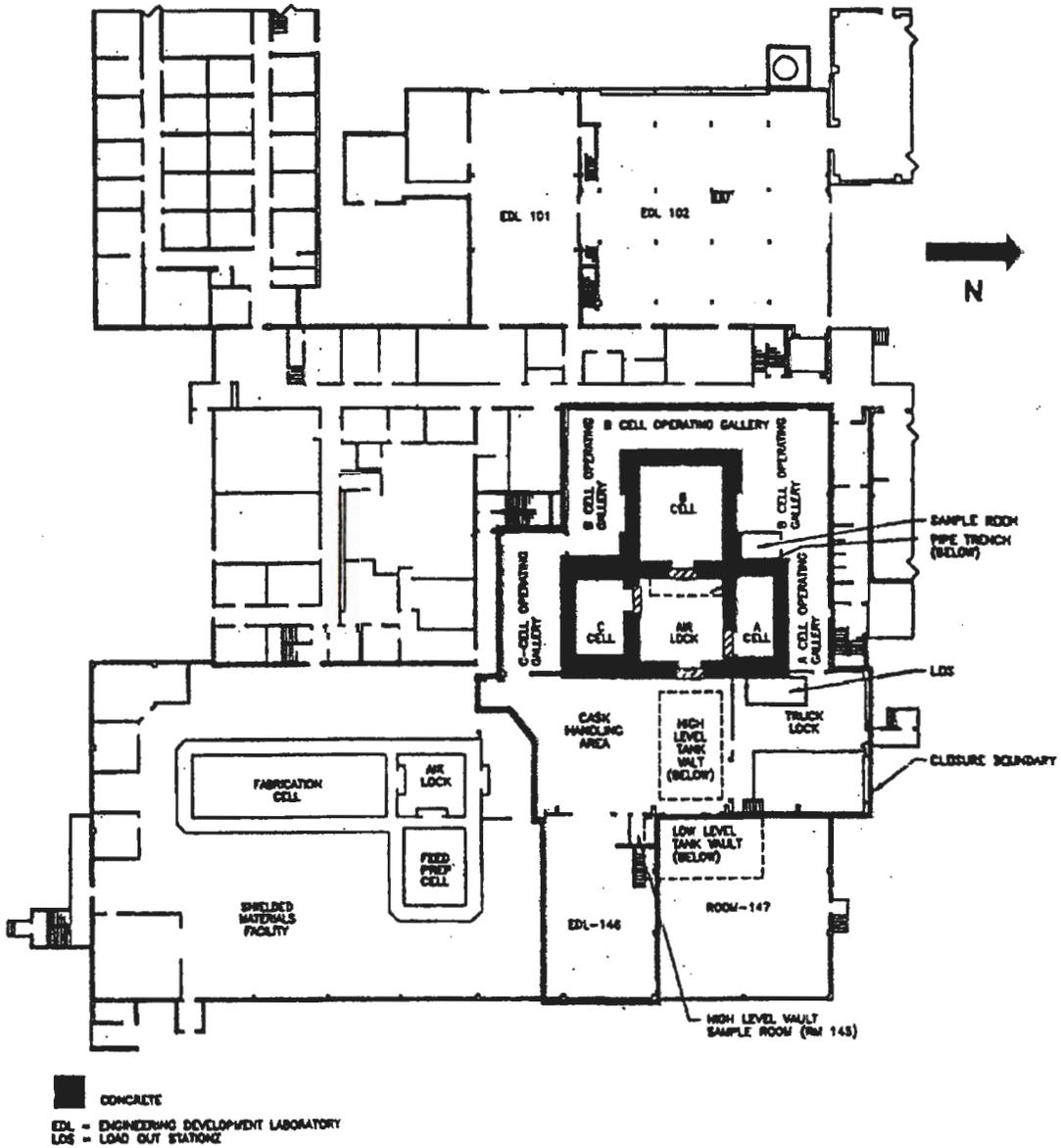
5

Figure H-1. Cut-Away of the 324 Building showing the High-Level Vault, Low-Level Vault, and the Radiochemical Engineering Cells



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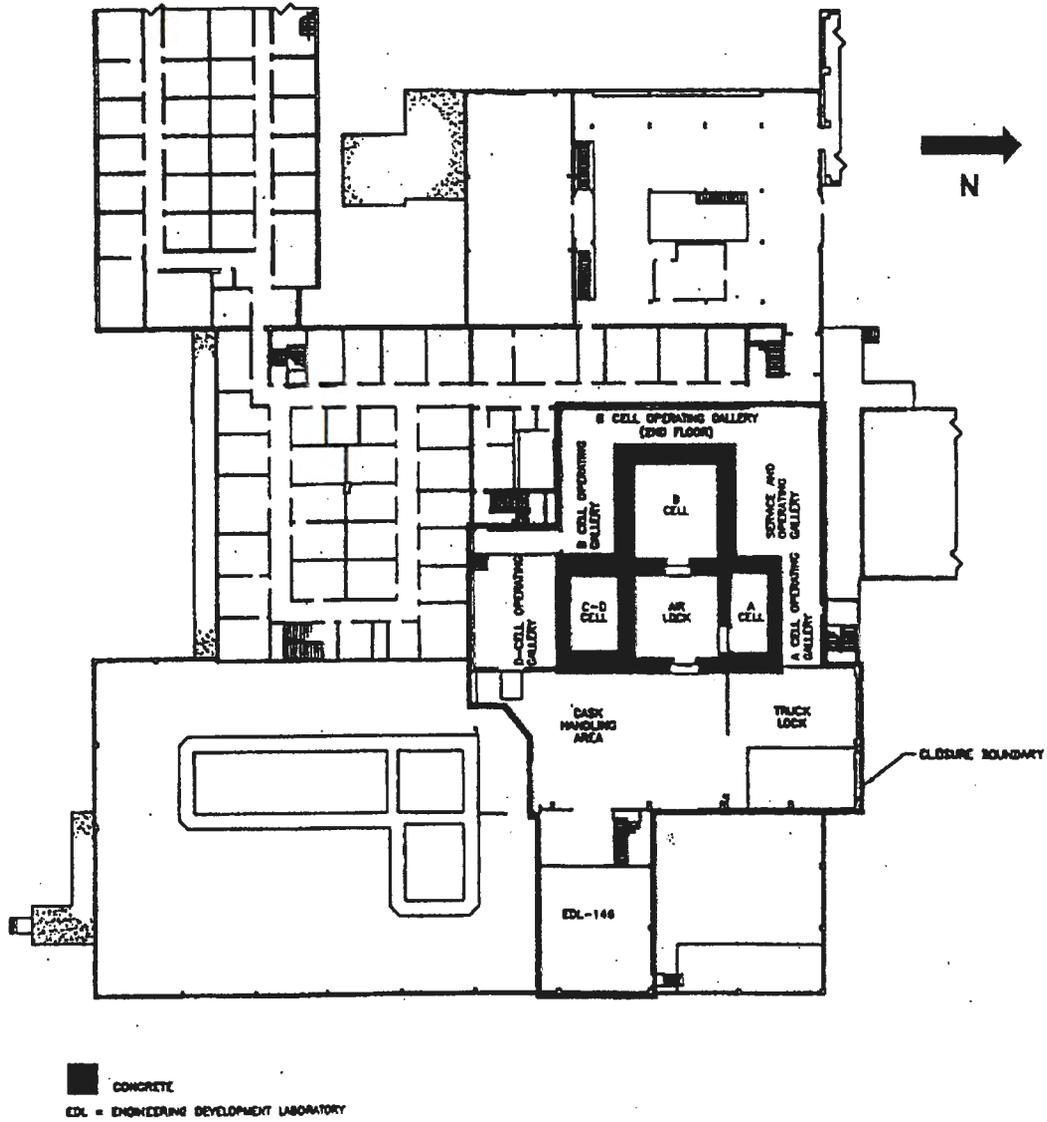
Figure H-2. 324 Building Basement Plan



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Figure H-3. 324 Building First Floor Plan

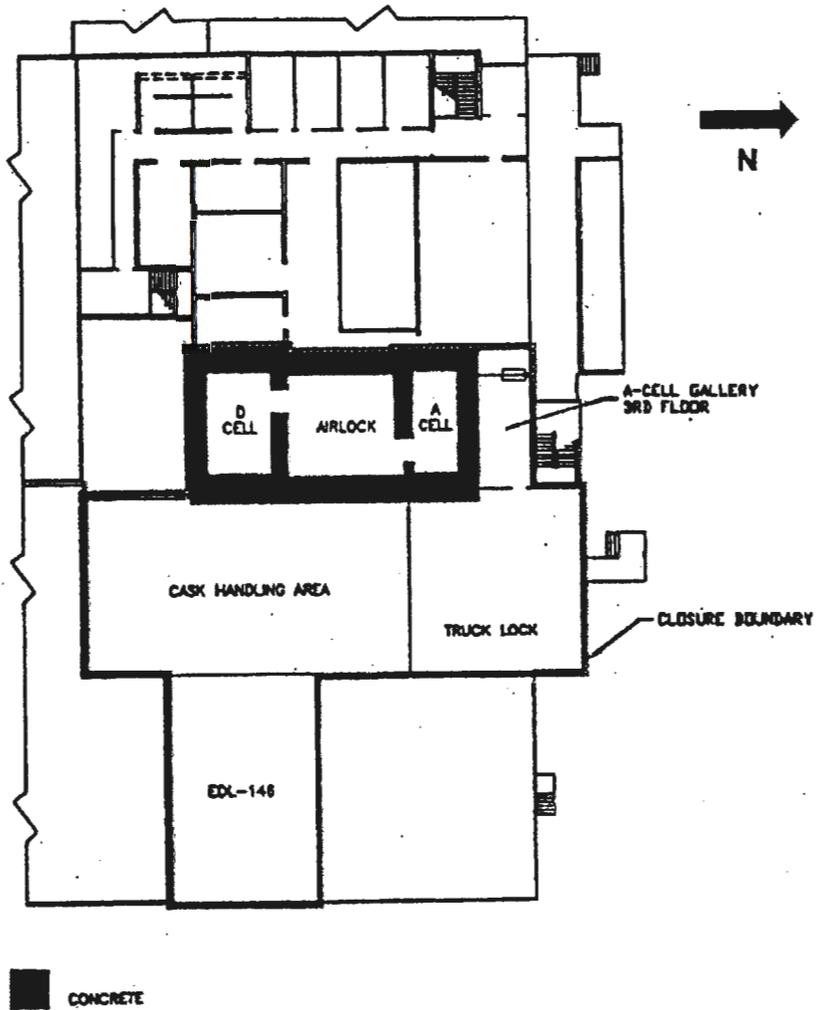
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Figure H-4. 324 Building Second Floor Plan

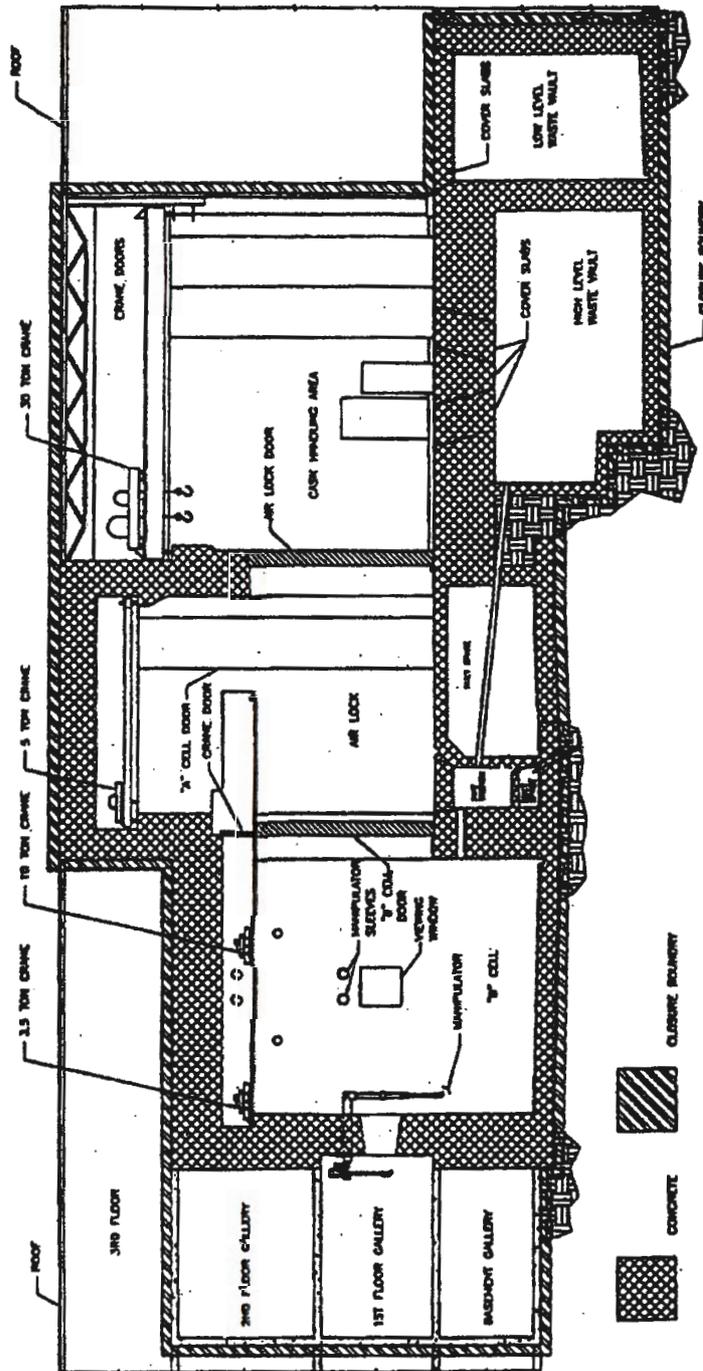
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Figure H-5. 324 Building Third Floor Plan

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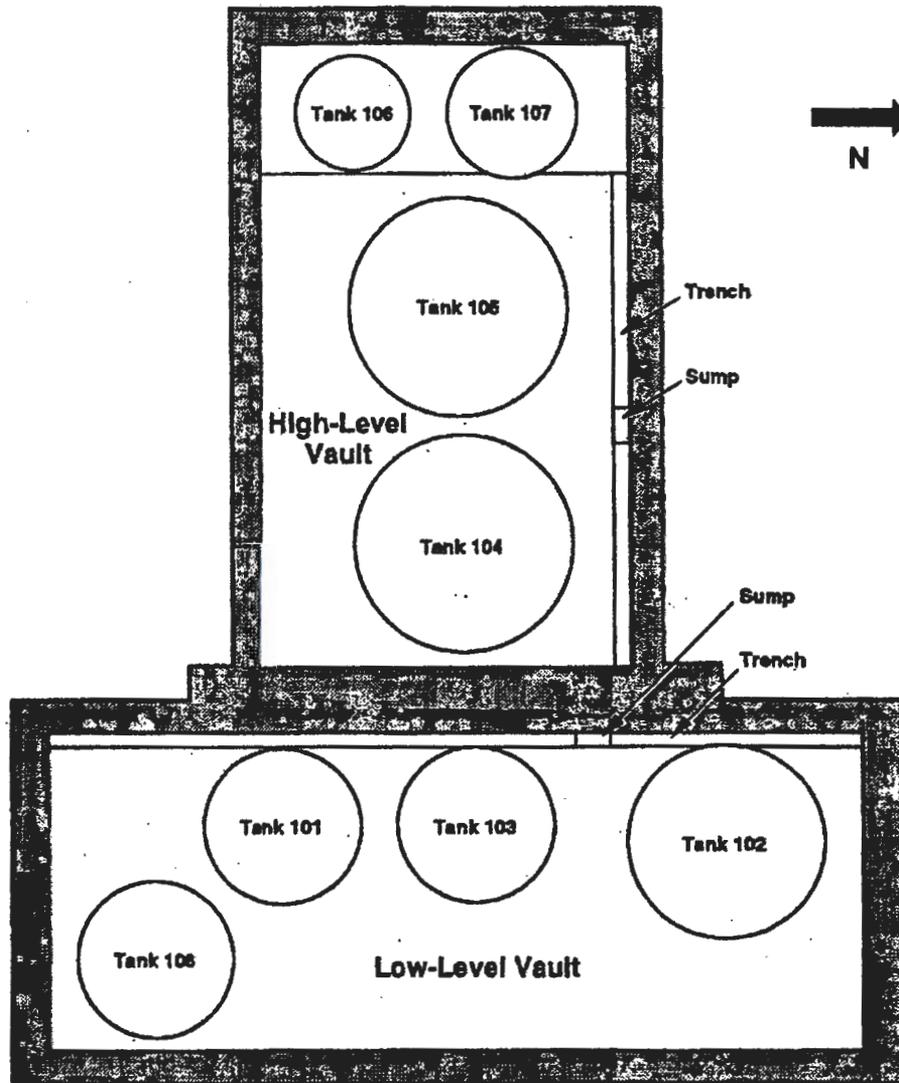
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Figure H-6. 324 Building Cross-Section through the High-Level Vault, Low-Level Vault, Airlock, and B-Cell Section View (Looking North)

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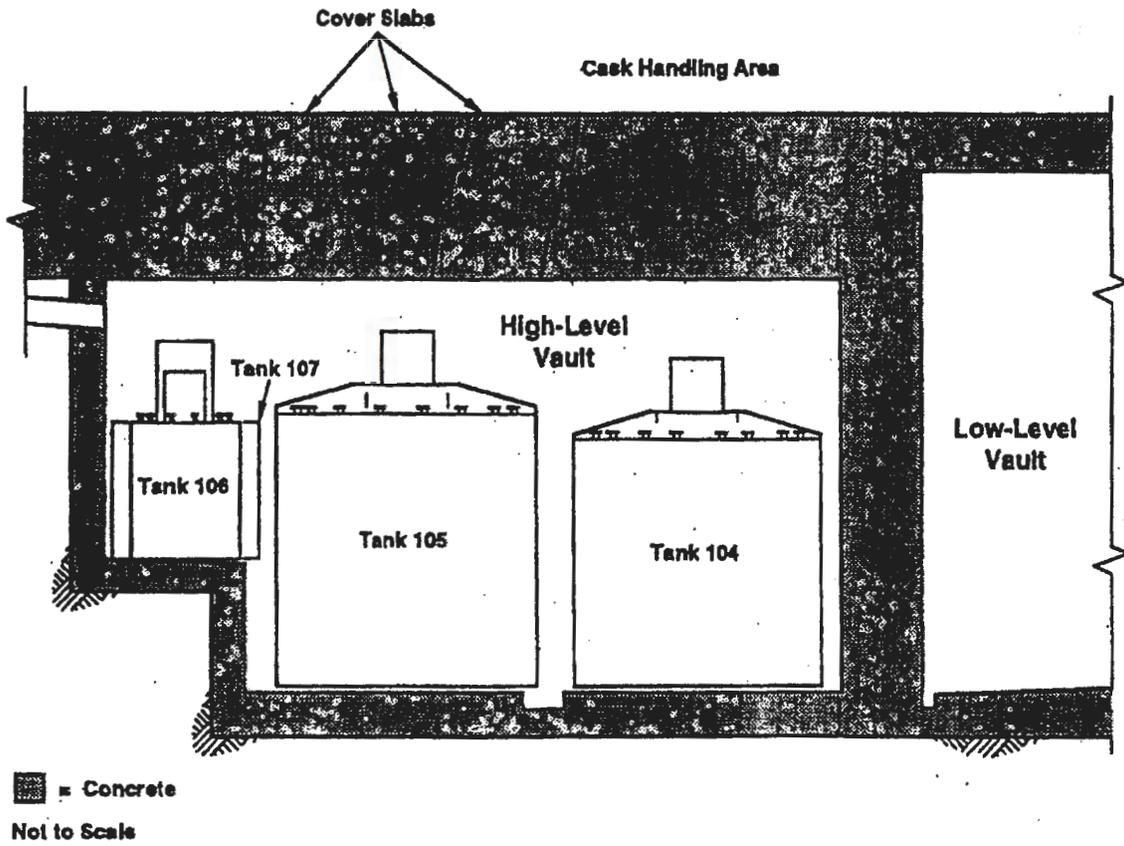


■ = Concrete

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Figure H-7. 324 Building High-Level Vault, Low-Level Vault, and Vault Tanks Plan View

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Figure H-8. 324 Building High-Level Vault Cross-Section (Looking North)

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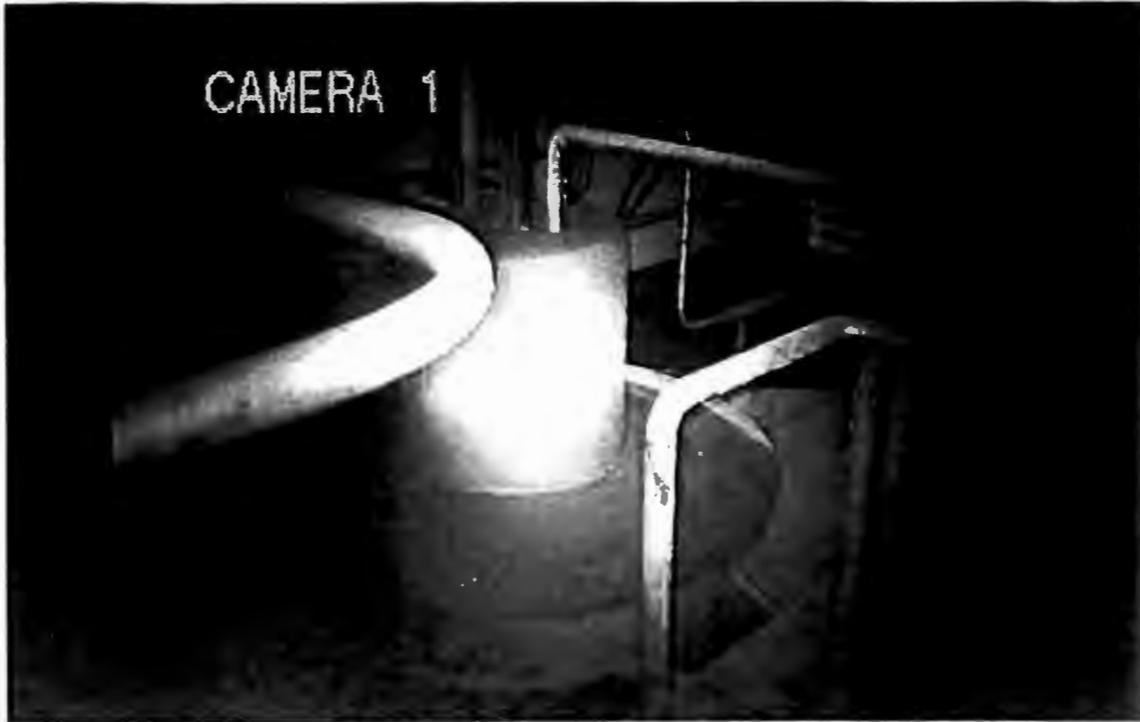
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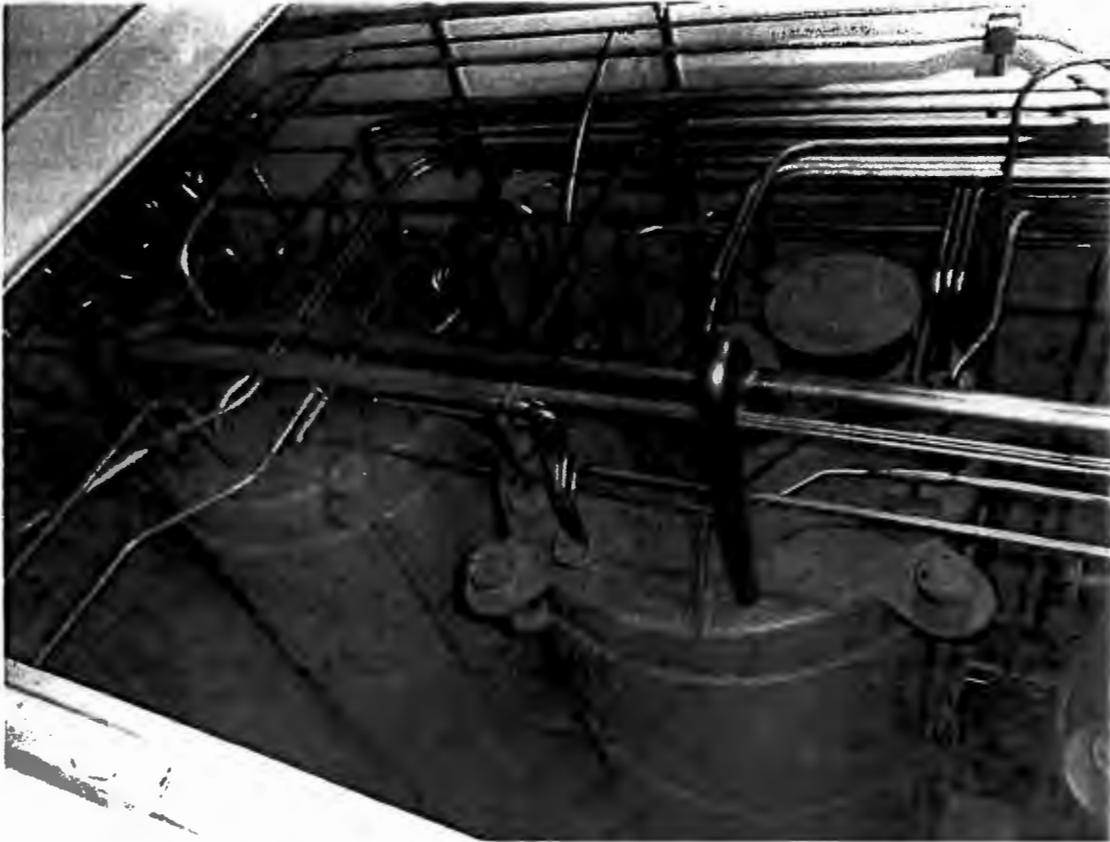
Figure H-9. 324 Building High-Level Vault Construction Photograph

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Figure H-10. Tank 105 Post Grout Photograph



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Figure H-11. 324 Building Low-Level Vault Construction Photograph

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Figure H-12. 324 Building Airlock Shield Door Opening Photograph

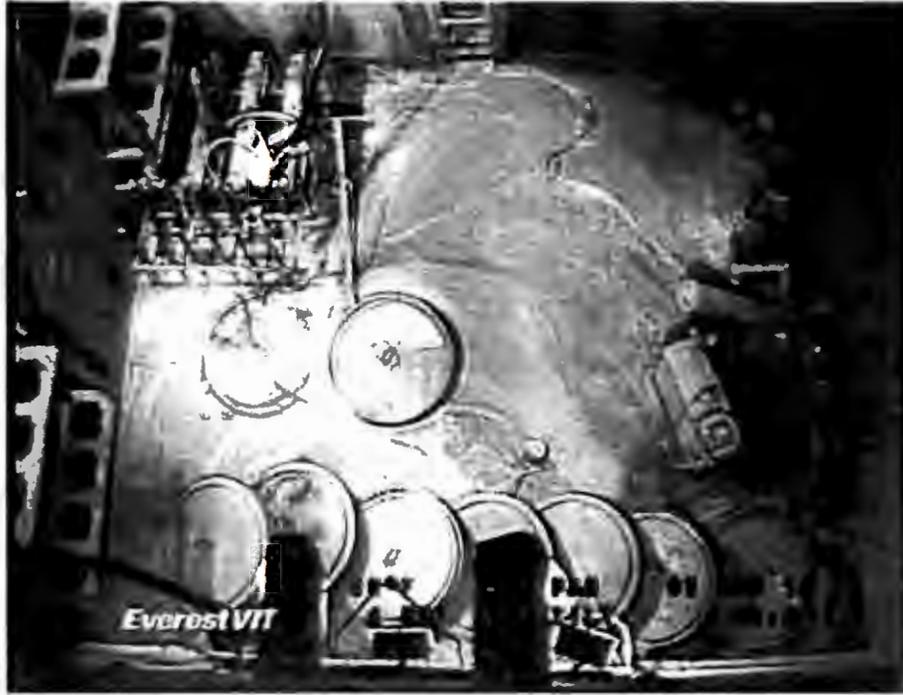
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Figure H-13. 324 Building B-Cell Floor Prior to Placing Grout Photograph (Note the failed sump in the upper right hand corner)

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Figure H-14. 324 Building B-Cell Floor After Placing Grout Photograph

H2 References

- 1
- 2 *324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated*
- 3 *Areas Closure Plan, DOE/RL-96-73, Revision 3*
- 4 *324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated*
- 5 *Areas Closure Plan, DOE/RL-96-73, Revision 1*
- 6 40 CFR 268, "Land Disposal Restrictions."
- 7 40 CFR 268.45 Table 1, "Alternative Treatment Standards for Hazardous Debris"
- 8 *Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA*
- 9 *Final Record of Decision for 300-FF-2 and 300-FF-5 and Record of Decision Amendment for 300-FF-1*
- 10 *National Priorities List Agreement/Change Control Form NPL-141*
- 11 *DOE/RL-2001-47, Record of Decision for 300-FF-2 and 300-FF-5 and Record of Decision Amendment*
- 12 *for 300-FF-1 Remedial Design Report/Remedial Action Work Plan for 300-FF-2 Soils*
- 13 *DOE/RL-2014-13-ADD 1, Remedial Design Report/Remedial Action Work Plan for 300-FF-2 Soils*
- 14 *DOE/RL-2004-77, Removal Action Work Plan for 300 Area Facilities*
- 15 *Resource Conservation and Recovery Act of 1976*
- 16 *Tri-Party Agreement*
- 17 *WA7890008967, Hanford Facility Resource Conservation and Recovery Act Permit*
- 18 WAC 173-303-070, "Designation of Dangerous Waste
- 19 WAC 173-303-140, "Land Disposal Restrictions
- 20 WAC 173-303-320(2), "General Inspection."
- 21 WAC 173-303-610(6),
- 22 WAC 173-303-610(2), "Closure and Post-Closure
- 23