



Tri-Party Agreement

9513346.1942

START

M-17 and 324 Building TPA Change Packages

0041327



The Washington Department of Ecology (Ecology), the U.S. Department of Energy (USDOE), and the U.S. Environmental Protection Agency (EPA) signed the Hanford Tri-Party Agreement (TPA) in 1989 to provide overall direction on clean up of the former Hanford Nuclear Reservation. In April 1995, the three agencies reached tentative agreement to add Milestone M-89-00 relating to closing and properly managing waste in the 324 Building and to modify TPA Milestone M-17-00A involving the 200 Area Effluent Treatment Facility. However, the agencies remain in dispute on USDOE's request to extend two interim M-17 milestones requiring completion and startup of the 200 Area Effluent Treatment Facility by **June 30, 1995**.

A 30-day public comment period will begin **May 8, 1995**, on the milestone addition/modification draft agreements. The comment period will end **June 8, 1995**. No public meetings are scheduled for these TPA changes. These draft agreements may be modified as a result of public comment. Signing of the agreements will occur after all comments are considered.

MILESTONE M-89: 324 BUILDING LABORATORY CLEANUP

Located about five miles north of Richland, the 324 Waste Technology Laboratory was constructed between 1964 and 1966 in Hanford's 300 Area. The facility, which houses hot cells and laboratories, performed work relating to waste vitrification, and also conducted testing on irradiated fuel elements and structural materials.

Currently stored in the laboratory are more than 134 cubic feet of highly radioactive mixed waste in the facility's Radiochemical Engineering B Cell and more than 800 gallons of highly

radioactive mixed waste in the facility's High Level Vault tanks.

The three-party tentative agreement outlines a series of TPA milestones designed to lead to Resource Conservation and Recovery Act closure of the facility and the reduction of risks to human health and the environment through compliance with state and federal regulations. Milestones in the agreement call for USDOE to submit a closure plan covering the 324 Building's Radiochemical Engineering B-Cell, D-Cell, and High Level Vault by December 31, 1995. After Ecology's approval of the plan, a milestone date will be set for the complete closure of these units.

Other M-89 interim milestones will require the removal of the majority of 324 Building High Level Vault tank waste by October 31, 1996, and removal of the building's B-Cell mixed waste and equipment by May 31, 1999.

MILESTONE M-17: 200 AREA EFFLUENT TREATMENT FACILITY

Milestone M-17-00A of the TPA requires the treatment or elimination of all major (Phase I) Hanford liquid effluent streams by June 30, 1995. Two interim M-17 milestones established June 30, 1995, as the deadline to initiate full-scale hot operation of the 200 Area Effluent Treatment Facility and to implement Best Available Technology (BAT) and All Known, Available, and Reasonable methods of prevention, control, and Treatment (AKART), for the 242-A Evaporator process condensate, a dilute liquid waste stream feeding the 200 Area Effluent Treatment Facility.

The 200 Area Effluent Treatment Facility currently is under construction just inside the northeast corner of Hanford's 200 East Area, about 24 miles northwest of Richland. The plant

START

will use a series of wastewater treatment processes to treat 242-A Evaporator process condensate. USDOE uses the 242-A Evaporator to concentrate liquid waste in Hanford's double-shell waste storage tanks and to reduce the volume of waste in single-shell tanks. The process condensate is sent to the Liquid Effluent Retention Facility (LERF) basins where it is temporarily stored prior to treatment in the 200 Area Effluent Treatment Facility. The LERF consists of three covered and lined surface impoundments just south of the 200 Area Effluent Treatment Facility.

Due to construction delays, the 200 Area Effluent Treatment Facility is currently projected to start operations no later than March 1996. The three TPA agencies have agreed to amend the M-17-00A milestone descriptive language to allow the temporary storage of 242-A Evaporator process condensate in the LERF until treatment capacity is available. However, pending the outcome of the dispute resolution process, the

200 Effluent Treatment Facility startup interim milestones M-17-14 and M-17-29 may be missed. There will be no adverse environmental impact associated with any of these potential TPA changes.

HOW YOU CAN BE INVOLVED

Comments on the 324 Building and 200 Area Effluent Treatment Facility milestone changes may be provided to the Washington Department of Ecology during the 30-day comment period which will end June 8, 1995. Send comments to Robert Harper, Washington Department of Ecology, Nuclear Waste Program, P. O. Box 47600, Olympia, WA 98504-7600.

For additional information, call Roger Stanley, Ecology, at (360) 407-7108, Doug Sherwood, EPA, at (509) 376-9529, or Dale Jackson, USDOE, at (509) 376-4851.

For More Information

If you would like more information, call Hanford Cleanup toll-free 1-800-321-2008. All documents relating to the draft TPA agreements are available for review and copying at the Hanford Tri-Party Agreement Public Information Repositories:

Seattle

University of Washington
Suzzallo Library
Government Publications Room
(206) 543-4664

Portland

Portland State University
Branford Price Millar Library
Science and Engineering Floor
SW Harrison and Park
(503) 725-3690

Spokane

Gonzaga University
Foley Center
E. 502 Boone
(509) 328-4220 Ext. 3125

Richland

Washington State University, Tri-Cities
USDOE Public Reading Room
100 Sprout Road
(509) 376-8583

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

Description/Justification of Change (continued)

The revised milestone is as follows:

M-17-00A Complete Liquid Effluent Treatment Facilities/Upgrades 6/30/1995
for All Phase I Streams.

Hanford currently has 19 Phase I liquid effluent streams being discharged to cribs, ponds, or ditches. Phase I streams are defined in the "Annual Status Report of the Plan and Schedule to Discontinue Disposal of Contaminated Liquids into the Soil Column at the Hanford Site," September 1988. Some of the cribs, ponds, or ditches are RCRA waste disposal units. These, along with others, are located in areas requiring inactive site investigations/remedial actions. Liquid effluent streams are classified as Phase I streams based upon radionuclide/chemical content, regulatory requirements relative to the waste disposal unit, chemical spill potential, and waste disposal unit life expectancy. Each of the Phase I effluent streams shall be either treated, or eliminated, ~~as defined in the above referenced report~~ or stored pending implementation of BAT/AKART. BAT/AKART for stored streams shall be implemented no later than March 31, 1996.

Interim milestones for Phase I streams include the development and implementation of an impact assessment methodology, sampling and analysis plans, treatment system design and construction commitments, interim flow restrictions and dates for ceasing discharge. ~~Specific interim/target milestone dates for each stream and any associated treatment or disposal facilities are included in Appendix D work schedules.~~

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

The construction contractor notified WHC/RL of a delay in construction completion from September 7, 1994, until November/December 1994 due to problems with several plant systems (primarily the computer control system). Based upon remaining work scope and past contractor performance, an actual construction completion closer to the March/April 1995 time frame is projected. Delays in construction completion past October 1, 1994, are impacting the baseline operational readiness and startup schedule, resulting in a day-for-day slip in the associated TPA milestones (M-17-14 and M-17-29).

Approximately 9 months of startup preparations are required by WHC prior to initiating plant operations. This consists of about 6 months of testing, training, and procedure activities, and about 3 months of readiness review activities.

Major milestone M-17-00A has 126 associated interim milestones of which 108 have been completed either on time or ahead of time. Included with this milestone are 22 waste water streams (19 Phase I streams and 3 Phase II streams) from 15 different facilities, with all streams on schedule to meet TPA milestones except the 242-A Evaporator Process Condensate. TPA milestones M-17-14 and M-17-29 cover hot startup of the 200 Area ETF and implementation of BAT/AKART for the process condensate stream, respectively. Both milestones are associated with the treatment of the process condensate stream to allow the 242-A Evaporator to continue operating.

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

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

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

DEPARTMENT OF ECOLOGY
NUCLEAR & MIXED WASTE MANAGEMENT
P O BOX 47600
OLYMPIA WA 98504-7600

FIRST CLASS
U.S. POSTAGE PAID
Washington State
Department of Printing