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Department of Energy

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

0041585

95-PCA-358

JUN 15 1995

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

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

Addressees:

CHANGE REQUEST M-17-95-02: REVISE M-17-00A TO ALLOW FOR TEMPORARY STORAGE PENDING IMPLEMENTATION OF BAT/AKART

The subject formal Class I Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) change control form M-17-95-02: "Revise M-17-00A to Allow for Temporary Storage Pending Implementation of BAT/AKART," (Attachment) has been approved by the U.S. Department of Energy, Richland Operations Office (RL) and is hereby transmitted for your approval. Originally submitted by RL on March 13, 1995, this form was disapproved by the agencies due to insufficient public involvement. A thirty-day public comment period for the change control form ended on June 8, 1995, during which time there were no comments from the public. As agreed to by all parties, the same change control form was to be submitted for approval after consideration and disposition of public comments. The signed form is being provided to the State of Washington, Department of Ecology. Upon disposition, please transmit the form to the U.S. Environmental Protection Agency. In accordance with revised Tri-Party Agreement Article XL, paragraph 122, your action is requested within the specified 14 day period.

This change request is necessary to revise major milestone M-17-00A to allow for temporary storage of 242-A Evaporator Process Condensate in the Liquid Effluent Retention Facility, pending implementation of Best Available Technology or All Known Available and Reasonable methods of prevention, control, or Treatment (BAT/AKART). This change is due to the schedule delay in construction completion of the 200 Area Effluent Treatment Facility.



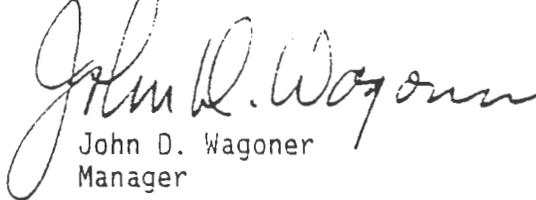
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Should you have any questions regarding this matter, please feel free to call me on (509) 376-7395 or Mr. Thomas K. Teynor, Director, Waste Programs Division on (509) 372-1786.

Sincerely,



John D. Wagoner
Manager

Attachment:
Revise M-17-00A to Allow for
Temporary Storage Pending
Implementation of BAT/AKART

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

9513382.0252

Change Number M-17-95-02	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date 6/12/95
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Originator S. D. Godfrey	Phone (509) 372-0501
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Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager
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Change Title Revise M-17-00A to Allow for Temporary Storage Pending Implementation of BAT/AKART
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Description/Justification of Change Revise Major Milestone M-17-00A. <div style="text-align: right;">(Continued on next page)</div>
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Impact of Change <p>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.</p>
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Affected Documents <p>Hanford Federal Facility Agreement and Consent Order, Fourth Amendment, January 1994, Appendix D (Table D, pages D-23 and D-24).</p>

Approvals <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 30%;"> <p><i>[Signature]</i> _____ FOE</p> <p>_____ EPA</p> <p>_____ Ecology</p> </div> <div style="width: 20%;"> <p><u>6/15/95</u> Date</p> <p>_____ Date</p> <p>_____ Date</p> </div> <div style="width: 40%;"> <p><input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved</p> <p><input type="checkbox"/> Approved <input type="checkbox"/> Disapproved</p> <p><input type="checkbox"/> Approved <input type="checkbox"/> Disapproved</p> </div> </div>	
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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 has notified WHC/RL several times of delays in construction completion, from the original September 7, 1994, contract date, due to problems with several plant systems. Based upon remaining work scope and past contractor performance, an actual construction completion date in the August/September 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 slip in the associated TPA milestones (M-17-14 and M-17-29). As a result of significant schedule enhancements, the previously scheduled 9 months of startup preparations required by WHC prior to initiating plant operations (from facility turnover until hot operations), has been reduced to about 2-3 months. The activities consist of testing, training, and procedure preparation/approval, followed by readiness review activities. Actual facility operations are projected to commence in November 1995, barring additional unforeseen problems.

Major milestone M-17-00A has 126 associated interim milestones of which 121 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 the 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.

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
J. D. Wagner, RL	C. Clarke, EPA M. Riveland, Ecology	Incoming: 9503148

Subject: CHANGE REQUEWST M-17-95-02: REVISE M-17-00A TO ALLOW FOR TEMPORARY STORAGE PENDING IMPLEMENTATION OF BAT/AKART

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	X
		L. D. Arnold	B2-35	X
		B. A. Austin	B3-03	X
		A. J. Diliberto	H6-10	X
		C. J. Geier	R2-36	X
		S. D. Godfrey	B2-35	X
		G. W. Jackson	S6-71	X
		J. J. Luke	H6-25	X
		P. J. Mackey	B3-06	X
		S. R. Moreno	B3-06	X
		R. D. Morrison	B2-35	X
		M. W. Peres	T7-39	X
		W. E. Ross	S5-07	X
Level 1, Assignee.....		R. E. Traister	B3-63	X
		J. D. Williams	H6-28	X
		EPIC	H6-08	X