

## TRI-PARTY AGREEMENT

<b>Change Notice Number</b> TPA-CN- 0771	<b>TPA CHANGE NOTICE FORM</b>	<b>Date:</b> 7/16/19
<b>Document Number, Title, and Revision:</b> DOE/RL-2009-124, 200 West Pump and Treat Operations and Maintenance Plan, Rev. 5		<b>Date Document Last Issued:</b> April 2016
<b>Approved Change Notices Against this Document:</b> TPA-CN-0725, -0759, -0776, -0795, and -0832		
<b>Originator:</b> S.M. Sexton		<b>Phone:</b> 373-2285

**Description of Change:**

Appendix B, Waste Management Plan for the 200 West Pump and Treat, in DOE/RL-2009-124, is revised to add the location and identification of the consolidated groundwater solid waste complex at the 6265A Building in the Central Plateau.

M.W. Cline **DOE** and E. Laija **Lead Regulatory Agency** agree that the proposed change modifies an approved workplan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, *Section 9.0, Documentation and Records, and not Chapter 12.0, Changes to the Agreement.*

Added two new figures (B-5 and B-6) to DOE/RL-2009-124 to show the location of the new consolidated groundwater solid waste complex at the 6265A Building located in the Central Plateau, as well as the outside of the building for identification.

Text was added to page B-12 to include the consolidated waste complex as an accepted IDW storage location. Added text is shown using a double underline.

**Note:** Include affected page number(s): B-9 & B-10

**Justification and Impacts of Change:**

The addition of a centrally located storage location will add efficiency to the management of IDW that is generated in the 200-UP-1/200-ZP-1 Groundwater Operable Units by allowing for the inspection of IDW MSW to be performed at one location. Figures B-5 and B-6 were added to show the location and identity of the 6265A Building.

**Approvals:**

<u>M. W. Cline</u> DOE Project Manager	<u>7/22/2019</u> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
<u>E. Laija</u> EPA Project Manager	<u>7/24/2019</u> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
N/A Ecology Project Manager	_____ Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved

## B3 Waste Management Requirements

The 200-ZP-1 and 200-UP-1 OU IDW and remediation waste will be managed in accordance with this WMP and substantive compliance with the ARARs, as identified in the 200-ZP-1 OU ROD and the 200-UP-1 OU interim ROD. The 200-DV-1 OU, 200-BP-5 OU groundwater, and ERDF leachate is comingled and becomes process water at the 200 West P&T and will also be managed under this waste management plan. Every effort will be made to minimize waste generated from investigation and remediation activities.

### B3.1 Waste Generation

All waste generated from 200 West P&T drilling activities will be managed in accordance with project procedures and/or waste planning documents.

### B3.2 Waste Packaging and Labeling

Waste packaging and labeling are performed in accordance with a waste packaging and labeling instruction sheet, or as directed by the waste management specialist.

Packaging and labeling during storage and transportation will meet the substantive requirements of WAC 173-303, "Dangerous Waste Regulations," and WAC 173-304, "Minimum Functional Standards for Solid Waste Handling," as identified in the RODs as being applicable, or relevant and appropriate. For onsite waste shipments, non-Department of Transportation (DOT) packaging may be used if the container will provide an equivalent degree of safety and approval documents are in place. Materials requiring collection will be placed in containers appropriate for the material and the receiving facility. DOT-approved drums may be used for some materials (e.g., drill cuttings); however, packaging and containment for large or irregular waste or large volume waste (e.g., GAC and resin) may require containers other than drums. The packaging and containment may include, but are not limited to, plastic wrap, 4 ft by 4 ft by 8 ft boxes, Environmental Restoration Disposal Facility (ERDF) roll-on/roll-off containers, and GAC canisters.

Waste generated from groundwater monitoring activities (e.g., well sampling, well maintenance, well decommissioning, and geophysical logging) may be bagged, taped, and labeled with the well number and the date the waste was generated. The bagged material would be transported in a protective manner (i.e., containment of the material is maintained) while proceeding from well to well in the OU. Waste bags will be placed in appropriate containers and stored at the established OU storage location or other approved consolidated storage location, or may be disposed directly to ERDF without storage, as directed by the waste management specialist.

Containers will be labeled and marked appropriately to match the waste designation established for each waste stream. The containers will be sealed and shipped to the identified disposal facility or storage area.

### B3.3 Waste Storage

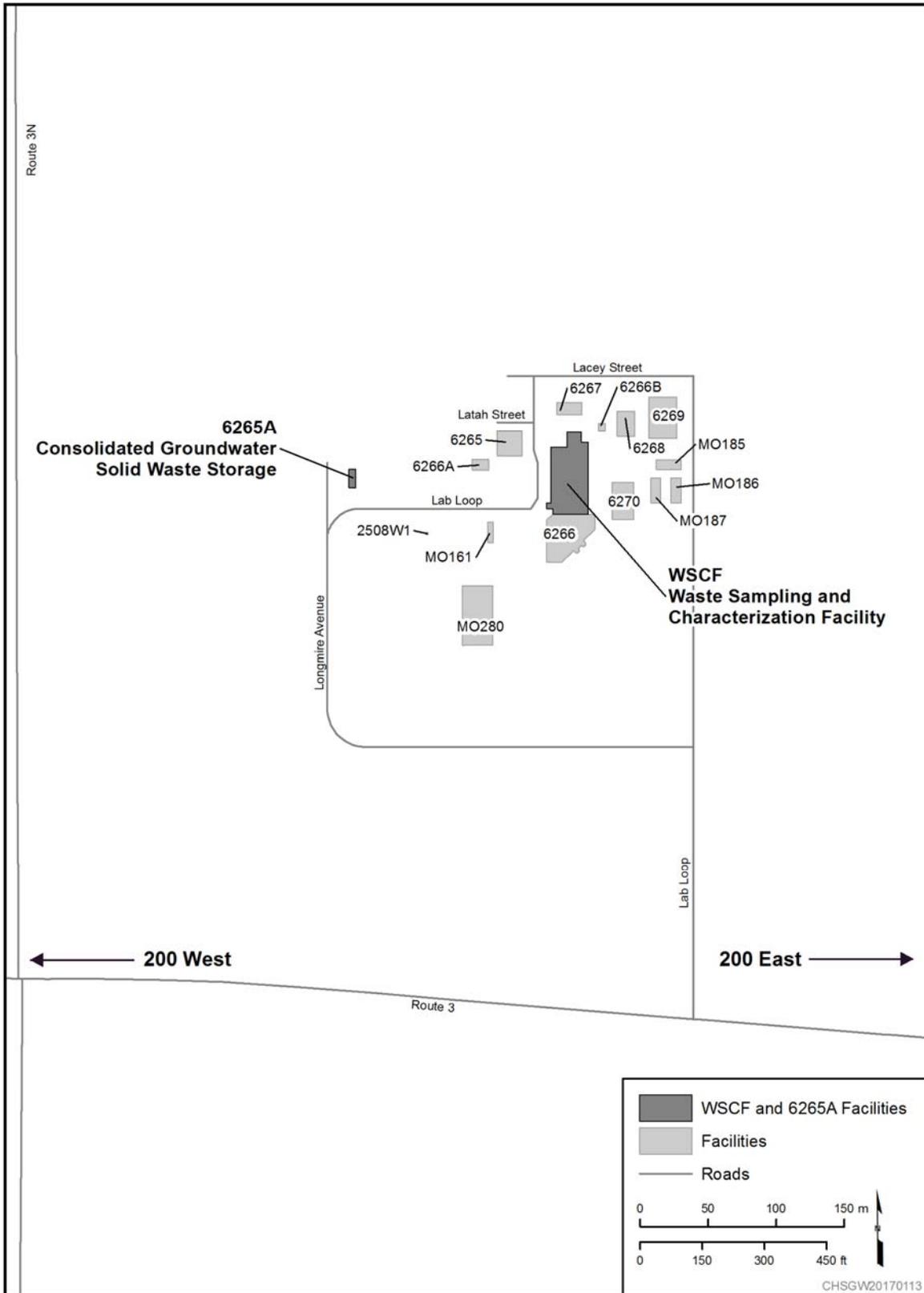
Segregation and staging of waste containers and packages will be performed in accordance with the waste packaging and labeling instruction sheet, or as directed by the waste management specialist. The amount of waste stored at the storage area should be kept to a minimum. Full containers should be prepared for disposal as quickly as economically feasible. Designated dangerous waste will be stored in defined storage areas. Designated dangerous waste and waste awaiting sampling, or pending analysis in defined storage areas, will be inspected weekly. Nondangerous waste storage areas will be inspected monthly or at the frequency directed by Soil and Groundwater Remediation Project operations. Miscellaneous solid

waste (MSW) will be collected when generated from the 200-UP-1/200-ZP-1 Groundwater OUs, and may be transported and stored at the 6265A Building located in the Central Plateau (Figures B-5 and B-6). Waste stored at the 6265A Building will be segregated by OU. The collection, transport, and storage of the solid waste will be conducted in accordance with the applicable or relevant and appropriate requirements (ARARs). Once waste storage activities are completed, the substantive requirements of WAC 173-303-200 regarding closure will be followed.

Remediation waste (e.g., resin, sludge, spent GAC, bag filters, and MSW) destined for disposal, and loaded GAC for offsite regeneration or disposal, may be stored on the pad within the 200 West P&T boundary (Figure B-3) for up to one year or longer with U.S. Department of Energy (DOE) and U.S. Environmental Protection Agency (EPA) concurrence. Larger volumes of waste (e.g., from well redevelopment) may be stored at the respective well pad until disposal at ERDF.



Figure B-3. 200 West P&T Waste Storage Location



**Figure B-5. The 6265A Building Location.**



**Figure B-6. The 6265A Building.**