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START
Change Number
M-20-94-09

Federal Facility Agreement and Consent Order
Change Control Form

Date
12/30/94

Do not use blue ink. Type or print using black ink.

Originator H. T. TILDEN

Phone 376-0499

Class of Change

I - Signatories II - Project Manager III - Unit Manager

Change Title DELETE INTERIM MILESTONE M-20-43 AND REPLACE WITH INTERIM MILESTONE M-20-43A.

Description/Justification of Change

Delete the following Tri-Party Agreement Milestone:

M-20-43 Submit Physical/Chemical Treatment Part B to Ecology and EPA (T-X-2) December 1994

Replace interim milestone M-20-43 with the following:

M-20-43A Submit Physical/Chemical Treatment Test Facilities Closure Plan to Ecology and EPA (T-X-2) September 1995

This closure plan will cover portion(s) of the Physical/Chemical Treatment Test Facilities within the current scope of that unit's Part A Permit Application, Form 3, and that have not been transferred to another Part A Permit Application, Form 3.

Continued on page 2 of 3.

Impact of Change

This change will eliminate the submittal of the Part B Permit Application for these facilities and requires the submittal of a closure plan for the portion(s) of the facilities which have managed dangerous waste.

Affected Documents

- Hanford Federal Facility Agreement and Consent Order, Appendix B and D.
- Part B Permit Application for the Physical/Chemical Treatment Test Facilities.
- SEPA Documentation for the Physical/Chemical Treatment Test Facilities.
- Part A Permit Application, Form 3 for the Physical/Chemical Treatment Test Facilities.

Approvals

FOR Steve Wisness

Janet R. Murphy 12/30/94 ✓ Approved _____ Disapproved
DOE Date

Kevin O'Leary 12/30/94 ✓ Approved _____ Disapproved
EPA Date

Robert Stanley 12/30/94 ✓ Approved _____ Disapproved
Ecology Date



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Description/Justification continued.

Change the planned action in Appendix B of the Hanford Federal Facility Agreement and Consent Order Action Plan from Treatment Operating Permit to Closure for the Physical/Chemical Treatment Test Facilities.

Justification of Change

In the original submittal of the Physical/Chemical Treatment Test Facilities Part A Permit Application, Form 3 in 1988, physical and chemical treatment activities were projected to occur at the 324 Building Engineering Development Laboratory (EDL), the EDL high bay, the hot-cell of the 324 Building, other selected laboratories in the 324, 325, 327, 329 and 3720 buildings in the 300 Area, and lysimeters in the 600 area. In June 1991, a revised Part A Permit Application, Form 3 was submitted which limited the physical and chemical treatment activities to the 324 Building Radiochemistry Hot-Cell, the 324 Building Biological Treatment Test Facilities, and added the 325 Shielded Analytical Laboratory (SAL).

Based on a subsequent RD&D Permitting Strategy Study conducted by RL, PNL, and Westinghouse Hanford Company (WHC), no physical or chemical treatment technologies or activities were identified that need RCRA permitting at this time, and no future need to obtain a "generic" permit for demonstrating these treatment technologies was identified.

Under the Physical/Chemical Treatment Test Facilities Part A Permit Application, Form 3, the 325 SAL conducted treatment tests on and stored small quantities of wastes produced during analytical chemistry operations. With approval from Ecology, the 325 SAL facility and activities have been transferred to the 325 Building Hazardous Waste Treatment Units Part A Application, Form 3. This Form 3 was submitted to EPA and Ecology on December 5, 1994.

Physical and/or Chemical treatment test activities that have been performed at these facilities were accomplished with simulated wastestreams, on treatability study samples, or on samples utilized for characterization. Treatment and storage activities performed with simulated wastestreams are not regulated by WAC 173-303.

Samples undergoing treatability studies are only subject to the requirements of WAC 173-303-050, WAC 173-303-145, and WAC 173-303-960 if the conditions of WAC 173-303-071(s)(i) through (xiii) are complied with. Samples utilized for characterization are not subject to the requirements of WAC 173-303 as long as the conditions of WAC 173-303-071(3)(1)(i) through WAC 173-303-071(3)(1)(iii) are complied with.

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Description/Justification continued.

Waste management activities in these facilities have included accumulation of hazardous waste in accordance with the generator requirements of WAC 173-303-200. However, some unpermitted treatment activities have taken place in portions of the facilities listed in the current Physical/Chemical Treatment Test Facilities Part A Permit Application, Form 3. These activities were not included within the scope of the current Physical/Chemical Treatment Test Facilities Part A Permit Application, Form 3.

In addition, some permitted waste management activities occurred in facilities covered by the current Physical/Chemical Treatment Test Facilities Part A Permit Application, Form 3. A closure plan will be prepared for these portions of the facilities by September 1995.

9/27 3323.2948
DON'T SAY IT --- Write It!

DATE: January 10, 1995

TO: J. H. Anderson B3-62
L. D. Arnold B2-35
R. C. Bowman H6-24
C. E. Clark A5-15
B. J. Day P7-79
D. M. Eder B3-62
W. C. Floberg G1-76
M. N. Jaraysi B5-18
D. L. Lenseigne S7-23
P. J. Mackey B3-15
D. L. Murphy A5-15
H. A. Myers B3-75
K. J. Oates B5-01
S. M. Price H6-23
R. P. Prosser H6-07
M. W. Rosenberry S7-57
D. R. Sherwood B5-01
H. T. Tilden P7-79
M. C. Vargas K8-50
J. L. Waite B2-35
A. J. Watts B3-75
EPIC H6-08

FROM: R. D. Morrison B2-35

Telephone: 376-6574

cc: RDM File
OSK File
TPA File

SUBJECT: APPROVED HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
CHANGE REQUEST M-20-94-09

Attached for your information is an unofficial copy of approved Hanford Federal Facility Agreement and Consent Order change request "Delete Interim Milestone M-20-43 and Replace with Interim Milestone M-20-43A.

If you have any questions, please call me on 376-6574.

ceg

Attachment