



### *Tri-Party Agreement*

# PROPOSED CHANGES TO TANK WASTE 9061618 RETRIEVAL MILESTONES

The Tri-Party Agencies (U.S. Department of Energy, U.S. Environmental Protection Agency, and Washington State Department of Ecology) want your input on proposed changes to Tri-Party Agreement (TPA) Milestones M-45 and M46. The changes establish requirements for how Single-Shell Tank Waste Management Areas will be retrieved and closed.



### Background

Milestone M-45 establishes certain requirements for complete closure of all single-shell tank farms under the Resource, Conservation and Recovery Act (RCRA), including how much waste must be retrieved from the tanks, and the process for the U.S. Department of Energy (USDOE) to request a variance to leave more waste in a tank.

The agencies entered into negotiations in October 2003 to further define the requirements under this milestone. The proposed changes are aimed at establishing a standardized process and requirements for retrieving the single-shell tanks, dealing with ancillary equipment, and closing Tank Waste Management Areas.

### Overview of proposed changes

The goal of the proposed changes is to establish a process that will standardize TPA requirements for single-shell tank system retrieval and closure. Instead of multiple TPA milestones, this process requires USDOE to submit TPA primary documents that establish enforceable requirements and schedules.

This process will also serve as the method to identify and establish requirements to be used throughout the single-shell tank system. These requirements include:

- Creating criteria to define the order that single-shell tanks will be selected for retrieval and subsequent closure actions.
- Defining the process that will be used in retrieving wastes and closing components of the single-shell tank system following completion of the Tank Retrieval and Closure Environmental Impact Statement (EIS).
- Providing that these closure activities not begin until the Tank Retrieval and Closure EIS is complete.

Public Comment Period  
April 7 - June 7

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Specific elements of the process include requirements for the following information:

- § Waste Management Area Integration Studies. These studies will look at entire waste management areas from a system perspective, describe the inter-relationships between the various components, and describe a sequence of events for waste retrieval and closure.
- § Single-Shell Tank Retrieval Selection and Sequencing. This document will be used as the starting point for selecting tanks for retrieval and scheduling waste retrieval activities. Selection and sequencing will be done on a bi-annual basis.
- § Tank Waste Retrieval Work Plans. These documents may cover tanks; tanks and associated ancillary equipment; or ancillary equipment alone (as may be required) and address only actions that are associated with waste retrieval activities.
- § Retrieval System(s) Design & Construction. After selecting the waste retrieval technology or technologies for a tank, group of tanks, and/or ancillary equipment, USDOE will complete the design and construction of the retrieval system(s) based on the functions and requirements developed in the Tank Waste Retrieval Work Plans. This retrieval system design will include final design specifications, quality assurance process, acceptance and operational test plans, and a process control plan.
- § Residual Tank Waste Characterization. Before tank waste field retrieval activities are initiated, USDOE will develop a tank or component-specific retrieval Data Quality Objectives (DQO) document for the residual tank waste characterization in coordination with Ecology. As part of the process, USDOE will also develop a Sampling and Analysis Plan (SAP) for post-retrieval and closure sampling.
- § Retrieval Data Report. After USDOE has completed the retrieval actions described in the Tank Waste Retrieval Work Plans, they will either complete and submit to Ecology, within 120 days, a Retrieval Data Report, or a request for exception to retrieval criteria per Agreement Appendix H. The Appendix H option is only applicable for single-shell tanks.

The proposed changes also establish requirements for developing the above documents for retrieval of waste from the remaining 15 tanks in the C-Farm Waste Management Area and moves requirements from Milestone M-46 into M-45.

Additional changes include establishing criteria for developing single-shell tank system closure plans, closure activities for ancillary equipment, corrective actions for soil and groundwater remediation in tank waste management areas, developing and maintaining a performance assessment; and integrating tank waste management area closure activities with other Central Plateau cleanup actions.

## **A public comment period on these proposed changes is scheduled for April 7 – June 7, 2004.**

Comments may be submitted in writing to:

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The change package and related documents can be viewed on-line at: [www.hanford.gov/tpa/changelist.htm](http://www.hanford.gov/tpa/changelist.htm) or at the Information Repositories listed on the next page.

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