



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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COVERSHEET
Proposed Permit Modification

For Letter 21-NWP-003
Dated January 28, 2021

Re: Transmittal of the Proposed Agency-Initiated Permit Modification 8C.2020.7D of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 10, Waste Treatment and Immobilization Plant (WTP Permit), WA7890008967*

Due to the Governor's "Safe Start" Order, Ecology cannot distribute hard copy letters or enclosures, including DVDs, at this time. All letters are being sent electronically with embedded links to the enclosures.

The enclosures are on the Ecology website at <https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods>.

After the Order is lifted, Ecology will send all hard copy letters and associated hard copy enclosures or DVDs as appropriate.



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January 28, 2021

21-NWP-003

Brian T. Vance, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Valerie McCain, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: H4-02
Richland, Washington 99354

Re: Transmittal of the Proposed Agency-Initiated Permit Modification 8C.2020.7D of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*, Part III, Operating Unit Group 10, Waste Treatment and Immobilization Plant (WTP Permit), WA7890008967

Reference: See page 2

Dear Brian T. Vance and Valerie McCain:

This letter transmits the Department of Ecology's (Ecology) proposed Agency-Initiated Permit Modification 8C.2020.7D to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*, Part III, Operating Unit Group 10, Waste Treatment and Immobilization Plant (WTP Permit).

The Permittees are the United States Department of Energy – Office of River Protection as owner/operator and Bechtel National, Inc. as co-operator.

Ecology received the Permittees' WTP Dangerous Waste Permit Package WTP-003 with Letter 20-ECD-0028 (Reference), and accepts the package for inclusion in an Agency-Initiated Permit Modification.

The proposed Agency-Initiated Permit Modification includes draft documents to support revisions to the WTP Permit, Chapter 11, "Closure Plan," as required by Section III.10.C.8.b. This submittal also satisfies Compliance Schedule items LAW-8 and EMF-8, located in Appendices 1.3 and 1.4 of the WTP Permit. This Closure Plan identifies the actions necessary to close any WTP Dangerous Waste Management Unit (DWMU). This includes the removal of dangerous and mixed waste, and the decontamination of the permitted DWMUs, ancillary equipment, and the associated secondary containment systems.

The following revised documents are proposed to be updated in the WTP Permit:

- Chapter 11, "Closure Plan."
- Appendix 1.3, *WTP Interim Compliance Schedule, WTP Low-Activity Waste Facility*.
- Appendix 1.4, *WTP Interim Compliance Schedule, WTP Effluent Management Facility*.

Ecology will hold a public comment period from February 1, 2021 through March 17, 2021. The WAC 173-303-840(3)(d) requires at least a 45-day public comment period for a draft permit modification. A public hearing is not scheduled, but Ecology will consider holding one if there is enough interest.

Before making any final permitting decisions, Ecology will consider all comments received during the public comment period for the draft permit modification.

The proposed draft permit modification is on the enclosed DVD and is also available on Ecology's website at: <https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods>.

Copies of the DVD are also available at the Hanford Public Information Repositories in Richland, Spokane, and Seattle, Washington, as well as Portland, Oregon.

A hard copy and DVD is also on file at the locations listed below:

Department of Ecology
Nuclear Waste Program
3100 Port of Benton Boulevard
Richland, Washington 99354

United States Department of Energy
Administrative Record
2440 Stevens Center Place
Richland, Washington 99354

Individuals can request copies of the DVD and hard copies by contacting Ecology's Resource Center at (509) 372-7950.

If there are any questions, please contact Jeff Marusich, WTP Permit Writer, at (509) 372-7990 or jeff.marusich@ecy.wa.gov, or Mandy Jones, WTP Permit Coordinator, at (509) 372-7916 or mandy.jones@ecy.wa.gov.

Sincerely,

 Digitally signed by
Schleif, Stephanie
(ECY)

Stephanie Schleif
Deputy Program Manager
Nuclear Waste Program

jm/ag
enclosure

Reference: Letter 20-ECD-0028, dated June 16, 2020, "Submittal of the Waste Treatment and Immobilization Plant Chapter 11 Closure Plan WTP-003 to Meet Interim Compliance Schedule Items LAW-8 and EMF-8"

cc: See page 3

cc electronic w/o enc:

Dave Bartus, EPA
David Einan, EPA
Mary Beth Burandt, USDOE-ORP
Lori Huffman, USDOE-ORP
Christopher Kemp, USDOE-ORP
Glyn Trenchard, USDOE-ORP
Duane Carter, USDOE-RL
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Matthew Drumheller, USACE
Trevor Fox, USFW
Mike Livingston, WDFW
John Martell, WDOH
John Wiesman, WDOH
Randy Treadwell, WSDA
Allyson Brooks, WSDAHP

Cindy Preston, WSDNR
BNI Correspondence Control
CHPRC Correspondence Control
Environmental Portal
Gonzaga University Foley Center Library
Hanford Administrative Record,
Hanford Site-wide Permit
Hanford Facility Operating Record
MSA Correspondence Control
NWP RIM Coordinators, Ecology
PNNL Correspondence Control
Portland State University Library,
Government Information
University of Washington Suzzallo Library,
Government Publications
USDOE-ORP Correspondence Control
USDOE Public Reading Room, CIC
USDOE-RL Correspondence Control
EPA Region 10 Hanford Field Office,
Correspondence Control
WRPS Correspondence Control

cc w/enc, DVD and hard copy:

Hanford Administrative Record: Hanford Site-wide Permit
NWP Central File

WTP permit modification

Revising Chapter 11, Closure Plan

Public comment invited

We're inviting the public to comment on an Agency-Initiated Permit Modification to the Hanford Facility Resource Conservation and Recovery Act Permit, Revision 8C.

The proposed changes affect the Dangerous Waste Portion for the Treatment, Storage and Disposal of Dangerous Waste for the Waste Treatment and Immobilization Plant, located in Part III, Operating Unit Group 10.

The Waste Treatment and Immobilization Plant (WTP) is located on the Hanford Site in southeastern Washington. The plant will immobilize in glass (vitrify) 56-million gallons of dangerous radioactive and chemical waste currently stored in 177 underground storage tanks at Hanford.

The permittees are:

U.S. Department of Energy
Office of River Protection
P.O Box 450
Richland, WA 99352

Bechtel National, Inc.
2435 Stevens Center Place
Richland, Washington 99354

We invite you to comment on this WTP Closure Plan Modification, Feb. 1 to Mar. 17, 2021.

The proposed modification is specific to Chapter 11, Closure Plan. This Closure Plan details the actions necessary to close permitted Dangerous Waste Management Units (DWMUs) at WTP.

Background

WTP includes multiple facilities:

- Analytical Laboratory (Lab)
- Low-Activity Waste (LAW) Facility
- High-Level Waste (HLW) Facility
- Pretreatment Facility (PTF)
- Effluent Management Facility (EMF)
- Balance of Facilities (BOF)

WTP will be operated in two processing configurations. For near-term operations, WTP will be operated in the Direct Feed Low-Activity Waste (DFLAW) configuration requiring the Lab, LAW, and EMF to become operational first to process the low-activity waste from tank farms.

In the DFLAW configuration, the waste is pretreated to remove cesium and solids before the waste is sent to the LAW facility.

In this configuration, the pretreated waste will bypass the PTF and be fed directly from the tank farms to the LAW facility. The LAW facility is where the low-activity fraction of the waste will be solidified by vitrification. The liquid effluents generated in the LAW facility and the Lab are transferred and treated at EMF, which will reduce the effluent volume by evaporation.

When the PTF and the High-Level Waste Facility become operational, WTP will be operated in the baseline configuration.

The design life of WTP is 40 years after the initiation of waste treatment operations. When the WTP DWMUs are no longer in operation, they will need to be properly closed. This proposed closure plan will regulate those closure activities.

The closure plan will be revised and submitted for approval under Washington Administrative Code 173-303-830 (Permit Changes) prior to the initiation of closure on any of the WTP permitted DWMUs.

Proposed changes

This permit modification will update Chapter 11, Closure Plan. This Closure Plan identifies the actions necessary to close WTP permitted DWMUs. This includes the removal of dangerous and mixed waste and the decontamination of the permitted DWMU, ancillary equipment, and the associated secondary containment systems, if necessary.

The modification proposes changes to the following:

- Chapter 11, Closure Plan
- Appendix 1.3, WTP Interim Compliance Schedule, WTP Low-Activity Waste Facility
- Appendix 1.4, WTP Interim Compliance Schedule, WTP Effluent Management Facility

The revision and submittal of Chapter 11, Closure Plan satisfies portions of Unit-Specific Permit Conditions III.10.C.8, Closure and Interim compliance schedule items LAW-8 and EMF-8, located in Appendices 1.3 and 1.4 of the WTP Permit.

Chapter 11, Closure Plan has been revised to address technical comments provided by Ecology during the DFLAW Operating Permit Modification and to accurately describe the DFLAW Operating Configuration of the WTP.

Changes consist of:

- Minor editorial changes.
- A listing of permitted DWMUs in the WTP Permit.
- Added required regulatory details and clarified existing language necessary to support compliant closure.



Figure 1 Aerial view of WTP

Reviewing the proposed changes

We invite you to review and comment on this proposed Agency-Initiated Permit Modification, WTP Closure Plan, Feb. 1 to Mar. 17, 2021. See Page 4 for comment period dates and information on how to submit comments.

Copies of the application for the proposed permit and supporting documentation will be available during the public comment period online at Ecology's website at [Ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods](https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods). The documents will also be available at the Hanford Public Information Repositories listed below.

Ecology will consider and respond to all significant comments received during the public comment period. We will document our responses and issue a response to comments document when we make our final permitting decision.

Hanford's Information Repositories

Ecology Nuclear Waste Program

Resource Center
3100 Port of Benton Blvd.
Richland, WA 99354
509-372-7950

U.S. Department of Energy

Administrative Record
2440 Stevens Drive, Room 1101
Richland, WA 99354
509-376-2530

Washington State University Tri-Cities

Department of Energy Reading Room
2770 Crimson Way, Room 101L
Richland, WA 99354

University of Washington

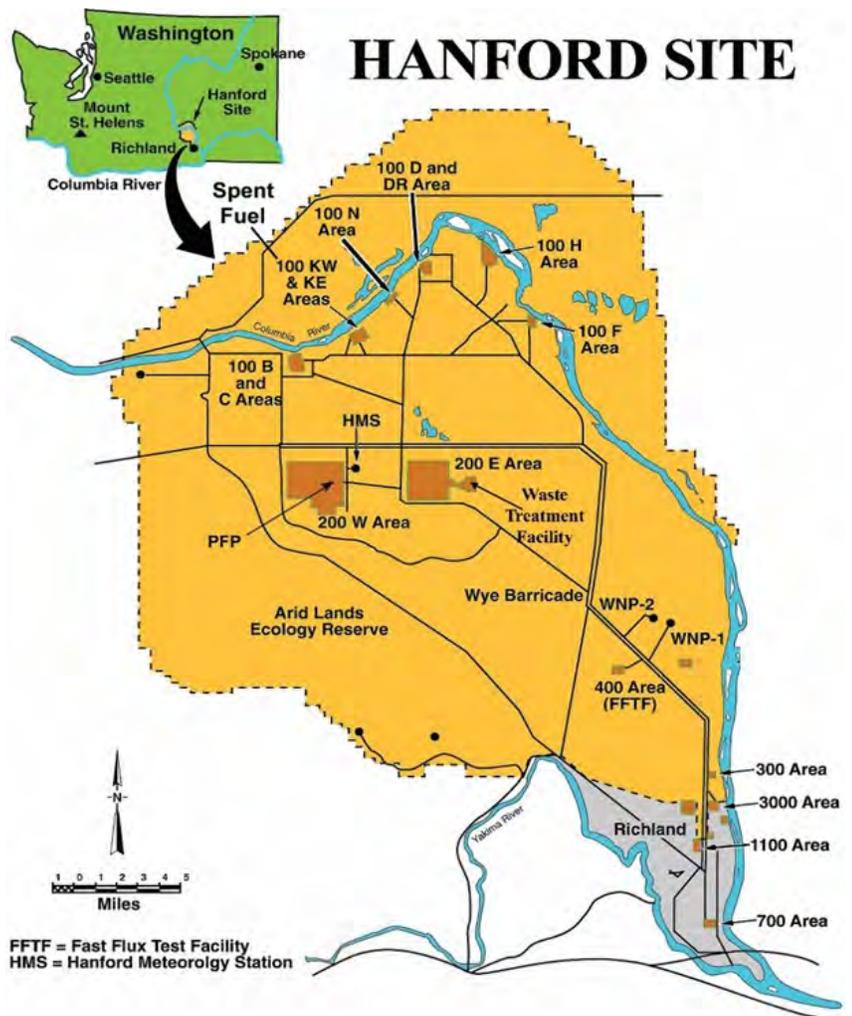
Suzzallo Library
P.O. Box 352900
Seattle, WA 98195
206-543-5597

Gonzaga University

Foley Center
502 E Boone Avenue
Spokane, WA 99258
509-313-6110

Portland State University

Millar Library
1875 SW Park Avenue
Portland, OR 97207
503-725-4542





3100 Port of Benton Blvd
Richland WA 99354

WTP permit modification

Public comment period Feb. 1 to Mar. 17 2021

Electronic submission (preferred):
<http://nw.ecology.commentinput.com/?id=tRJF7>

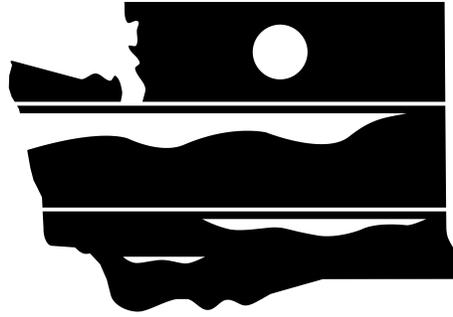
Mail or hand delivery

Daina McFadden
3100 Port of Benton Blvd
Richland, WA 99354

A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, contact:

Daina McFadden
509 372 7950
Hanford@ecy.wa.gov

To request an ADA accommodation, contact Ecology by phone at 509 372 7950 or email at Daina.McFadden@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877 833 6341.



DEPARTMENT OF
ECOLOGY
State of Washington

STATEMENT OF BASIS

Proposed Permit Modification (8C.2020.7D) to Part III of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, WA7890008967, Operating Unit Group 10, Waste Treatment and Immobilization Plant*

February 2020

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STATEMENT OF BASIS

Proposed Permit Modification (8C.2020.7D) to Part III of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, WA7890008967, Operating Unit Group 10, Waste Treatment and Immobilization Plant*

PERMITTEES

United States Department of Energy
Office of River Protection
(Owner/Operator)
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

Bechtel National, Inc.
2435 Stevens Center Place, MSIN H4-02
Richland, Washington 99354

The Washington State Department of Ecology (Ecology) developed this Statement of Basis in accordance with the requirements of Washington Administrative Code (WAC) 173-303-840(2)(f). Its purpose is to discuss the proposed draft permit modification to Part III of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste* (hereafter called the Hanford Site-wide Permit).

This proposed draft Agency-initiated Permit Modification (8C.2020.7D) updates the Waste Treatment and Immobilization Plant (WTP) Permit Chapter 11, "Closure Plan." This Closure Plan identifies the actions necessary to close WTP Dangerous Waste Management Units (DWMUs). The procedures and estimated times to complete these activities are discussed in this plan. Submittal of this closure plan completes the requirements of III.10.C.8.b and Compliance Schedule items LAW-8 and EMF-8, located in Appendices 1.3 and 1.4 of the WTP Dangerous Waste Permit.

This Statement of Basis is divided into five sections:

- 1.0 Hanford Facility Dangerous Waste Permit (Site-wide Permit) Background
- 2.0 WTP Permitting Process
- 3.0 WTP Operating Unit Group Description
- 4.0 Agency-initiated Permit Modification Process for the WTP Operating Unit Group
- 5.0 Procedures for Reaching a Final Decision on the Draft Permit Modification

Hanford Facility Dangerous Waste Permit (Site-wide Permit) Background

Ecology's Nuclear Waste Program (NWP) oversees management of dangerous waste within the State by writing permits to regulate its treatment, storage, and disposal.

Ecology has the authority to regulate dangerous waste and the dangerous waste components of mixed (radioactive and dangerous) waste, under 70.105 Revised Code of Washington (RCW) and WAC 173-303. The Hanford Site-wide Permit has requirements for the treatment, storage, and disposal of dangerous and mixed waste at Hanford. Ecology does not regulate waste that is solely radioactive. The U.S. Department of Energy (USDOE) has the exclusive authority to regulate radioactive materials and radioactive waste at Hanford.

Ecology first issued the Hanford Site-wide Permit in 1994. Since 1994, the permit has been modified many times to incorporate changes or updates and to incorporate and closeout several DWMUs.

The Hanford Site-wide Permit provides standard and general facility conditions as well as unit group conditions for the operation, closure, and post-closure care of mixed and dangerous waste Treatment, Storage, and Disposal (TSD) Units at Hanford. These TSDs are administratively grouped into operating, closure, or post-closure unit groups in the Hanford Site-wide Permit. Each unit group may contain one or more DWMUs.

The Hanford Site-wide Permit is organized as follows:

- Part I Standard Conditions.
- Part II General Facility Conditions.
- Part III Operating Units.
- Part IV Corrective Action for Past Practice Units.
- Part V Closure Units.
- Part VI Post-Closure Units.

Waste Treatment and Immobilization Plant Permitting Process

We are using a phased (or stepped) approach to permit the WTP TSD Unit. The initiation of the phased permitting to support WTP was completed on September 25, 2002, with issuance of a final Dangerous Waste Permit allowing construction of the Low-Activity Waste (LAW) Facility, Pretreatment Facility (PTF), High-Level Waste Facility (HLW), Analytical Laboratory (LAB) Facility, and Balance of Facilities (BOF).

The initial issuance of the WTP Permit supported the Baseline Configuration of the Facility. In the Baseline Configuration, the PTF and the HLW Facility will be used to support the treatment of high-level waste from the double-shell tanks. Tank waste will be sent directly from the Tank Farms to the PTF where it will be pretreated and sent to either the HLW Facility or the LAW Facility, depending on the waste characterization. In the future, the Permittees will provide Ecology with updated information in support of the Baseline Configuration. Ecology will review permit documents and design and provide them for public review and eventual incorporation into the WTP Permit. The current Consent Decree Milestone to start operations at PTF and HLW is 2033.

Since 2002 the Permittees have been submitting design documents and other information for Ecology approval as written in the Interim Compliance Schedules. The WTP Interim Compliance Schedules require that the Permittees provide Ecology additional detailed information and design documents to support construction and operations of regulated portions of the WTP DWMUs.

In 2016 Ecology agreed through Consent Decree milestones to operate a portion of the WTP Facility under the Direct Feed Low-Activity Waste (DFLAW) configuration, allowing operations of only the LAW, LAB, Effluent Management Facility (EMF), and BOF, while portions of the Baseline Configuration would remain in the construction phase.

To prepare for the DFLAW operations, Ecology has been actively incorporating permit documents and design into the WTP Permit. To reflect this new path forward, the WTP Permit includes language to reflect an operating and construction permit.

To support the anticipated startup of operations in the DFLAW Configuration the Permittees have been submitting documentation as required in the Interim Compliance Schedule for LAW, LAB, EMF, and BOF. These Interim Compliance Schedule Items require updating portions of the Dangerous Waste Permit Application to include operational language in permit conditions and chapters.

With this permit modification an updated Chapter 11, “Closure Plan,” will be incorporated into the WTP Permit. Submittal of this closure plan completes the requirements of III.10.C.8.b and Compliance Schedule items LAW-8 and EMF-8, located in Appendices 1.3 and 1.4 of the WTP Dangerous Waste Permit.

When all of the permitting steps are completed, the WTP TSD Unit will comply with all the applicable requirements of WAC 173-303. Then, after receiving written permission from Ecology, the Permittees can begin treatment and storage of dangerous and mixed waste at the WTP under both the DFLAW and Baseline Configurations.

Waste Treatment and Immobilization Plant Operating Unit Group Description

The WTP includes multiple facilities: LAB, LAW Facility, HLW Facility, PTF, EMF, and BOF.

The WTP will be operated in two processing configurations. For near-term operations, WTP will be operated in the DFLAW configuration requiring the LAB, LAW, EMF, and BOF to become operational first to process the low-activity waste from tank farms.

In the DFLAW configuration, the waste is pretreated to remove cesium and solids before the waste is sent to the LAW facility. In this configuration, the pretreated waste will bypass the PTF and be fed directly from the tank farms to the LAW facility. The LAW facility is where the low-activity fraction of the waste will be solidified by vitrification.

The liquid effluents generated in the LAW facility and the LAB are transferred and treated at EMF, which will reduce the effluent volume by evaporation. WTP will later be operated in the Baseline Configuration when the PTF and the HLW Facility become operational.

Type and Quantity of Waste

Currently, six major facilities are being designed and constructed; the LAW Facility, the HLW Facility, the PTF, the LAB, the EMF, and BOF. During dangerous waste management operations, the WTP will chemically separate, treat, and immobilize radioactive and dangerous (mixed) waste through vitrification.

During mixed waste treatment operations, WTP will utilize two separate configurations. The first configuration, known as the DFLAW configuration, will allow mixed waste to be transferred directly from the Low-Activity Waste Pretreatment System (LAWPS) to the LAW Facility, bypassing the PTF. The low-activity waste will then be treated in the LAW Facility using the vitrification process. Effluents generated during the process will be treated in the EMF. In the second configuration, known as the Baseline configuration, tank waste will be sent directly from the Tank Farms to the PTF. The mixed waste will then be pretreated and sent to either the HLW Facility or the LAW Facility, depending on the waste characterization. In both configurations, waste will be characterized prior to receipt at the WTP. The waste will only be transferred to WTP if it meets WTP’s waste acceptance criteria.

The type and quantity of waste processed at the WTP is provided in detail in the Part A of the WTP Permit.

Agency-Initiated Permit Modification Process for the Waste Treatment and Immobilization Plant Operating Unit Group

Proposed Modification to Part III of the Hanford Site-wide Permit

The draft documents for public review will support revisions to the WTP Permit, Chapter 11, “Closure Plan,” as required by Section III.10.C.8.b and Compliance Schedule items LAW-8 and EMF-8, located in Appendices 1.3 and 1.4 of the WTP Dangerous Waste Permit. This Closure Plan identifies the actions

necessary to close any WTP DWMU. This includes the removal of dangerous and mixed waste and the decontamination of the permitted DWMU, ancillary equipment, and the associated secondary containment systems.

Specifically, the following revised documents are proposed to be updated in the permit:

- Chapter 11, "Closure Plan."
- Appendix 1.3, *WTP Interim Compliance Schedule, WTP Low-Activity Waste Facility*.
- Appendix 1.4, *WTP Interim Compliance Schedule, WTP Effluent Management Facility*.

Procedures for Reaching a Final Decision on the Draft Permit Modification

The Washington State Dangerous Waste Regulations in WAC 173-303-830 describe the types of changes or modifications that may be made to a Dangerous Waste Permit issued by Ecology.

This draft permit modification was prepared according to the procedures in WAC 173-303-830(4)(d). As required by WAC 173-303-830(4)(d), draft permits issued by Ecology will have at least a 45-day public comment period. The public comment period for this draft permit will be February 1 through March 17, 2021.

Comments must be post-marked, received by e-mail, or hand-delivered no later than close of business (5:00 p.m. PST) March 17, 2021.

Direct all comments to (electronic preferred):

Daina McFadden
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

eComments link: <http://nw.ecology.commentinput.com/?id=tRJF7>

Ecology will consider and respond to all written comments on this draft permit modification that are submitted by the March 17, 2021 deadline. At the completion of the 45-day public comment period Ecology will make a final permitting decision. If the final decision is to issue the permit, Ecology will issue a final permit for Part III of the Hanford Site-wide Permit, Operating Unit Group 10, Waste Treatment and Immobilization Plant. If the final decision includes substantial changes to the draft permit modification because of public comment, Ecology will consider initiating a new public comment period.

A public hearing is not scheduled, but if there is enough interest Ecology will consider holding one.

To request a hearing, or for more information, contact:

Daina McFadden
Washington State Department of Ecology
(509) 372-7950

E-mail address: hanford@ecy.wa.gov

Ecology will also issue a Response to Comments document to the Permittees and the public upon issuance of the final permit. The final permit modification may be appealed within 30 days after issuance. If there is no appeal, the permit will be effective 30 days following issuance.

Copies of the following documents for Part III, Operating Unit Group 10, WTP are available for review at the Hanford Public Information Repositories locations listed below.

For additional information call (509) 372-7950 or e-mail hanford@ecy.wa.gov.

Hanford Public Information Repositories and Administrative Records

Richland, Washington

Ecology Nuclear Waste Program Resource Center
3100 Port of Benton Blvd.
Richland, WA 99354
(509) 372-7950
U.S. Department of Energy Administrative Record
2440 Stevens Drive, Room 1101
Richland, WA 99354
(509) 376-2530

Washington State University Tri-Cities
Department of Energy Reading Room
2770 Crimson Way, Room 101L
Richland, WA 99354
(509) 375-7443

Other Locations:

Portland

Portland State University
Branford Price Millar Library
1875 Southwest Park Avenue
Portland, Oregon 97201
(503) 725-4542

Spokane

Gonzaga University
Foley Center
502 East Boone Avenue
Spokane, Washington 99258
(509) 313-6110

Seattle

University of Washington Suzzallo Library
P.O. Box 352900
4000 15th Avenue Northeast
Seattle, Washington 98195
(206) 543-5597

Information on the proposed permit modification is also available online at <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>. If special accommodations are needed for public comment, contact Ecology's Nuclear Waste Program at (509) 372-7950.

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WASTE TREATMENT AND IMMOBILIZATION PLANT
CHAPTER 11.0
CLOSURE PLAN
CHANGE CONTROL LOG

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The “**Modification Number**” represents Ecology’s method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table

Modification Date	Modification Number
09/05/2017	8C.2017.6F
03/01/2017	8C.2016.Q4
05/23/2016	8C.2016.Q1

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DRAFT

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**CHAPTER 11.0
CLOSURE PLAN**

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DRAFT

**CHAPTER 11.0
CLOSURE PLAN**

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3
CHAPTER 11.0
CLOSURE PLAN

4 **Note:** Where information regarding treatment, management, and disposal of the radioactive source
5 byproduct material and/or special nuclear components of mixed waste (as defined by the *Atomic Energy*
6 *Act of 1954* as amended) has been incorporated into this document, it is not incorporated for the purpose
7 of regulating the radiation hazards of such components under the authority of this permit or chapter
8 70.105 Revised Code of Washington (RCW) and its implementing regulations but is provided for
9 information purposes only.

10 This chapter is the Resource Conservation and Recovery Act (RCRA) Closure Plan for the River
11 Protection Project Waste Treatment Plant (WTP) permitted Dangerous Waste Management Units
12 (DWMUs), as required per the Washington Administrative Code (WAC) 173-303-806(4)(a)(xiii). This
13 Closure Plan describes the activities that are necessary to close the WTP permitted DWMUs. The
14 procedures and estimated times to complete these activities are discussed in this plan. Submittal of this
15 Closure Plan completes the requirement of III.10.C.8.b and Compliance Schedule [items LAW-8 and](#)
16 [EMF-8Item 8](#).

17 This Closure Plan is provided in compliance with the applicable requirements of the
18 WAC 173-303-610, -620, and -806. This plan is also intended to demonstrate compliance with
19 Conditions II.J and III.10.C.8 of the Hanford Facility Dangerous Waste Permit (Ecology 2009).

20 With several exceptions, this plan follows the format of a typical Closure Plan as outlined in the
21 *Dangerous Waste Permit Application Requirements For facilities that store and/or treat dangerous*
22 *wastes in tank systems and/or containers*, Washington State Department of Ecology Hazardous Waste
23 and Toxics Reduction Program Publication 95-402 (Ecology 2013). The exceptions are the exclusion of
24 sections that do not apply to the WTP (financial assurance, liability, “already closed disposal unit,” and
25 post-closure requirements), and the addition of new sections not addressed in the guidance (closure of
26 tank, miscellaneous unit, container storage, and containment building units).

27 **11.0 INTRODUCTION**

28 This Closure Plan identifies the steps and procedures necessary to close any WTP permitted DWMU at
29 any point in its active life. This includes the removal of dangerous and mixed waste and the
30 decontamination of the permitted DWMU, ancillary equipment, and the associated secondary
31 containment systems. The RCRA closure activities will be consistent with the requirements of the WTP
32 deactivation, decontamination, and decommissioning plan to be prepared under separate authorities.
33 They will be revised as necessary to maintain consistency between the plans. Deactivation of the WTP is
34 discussed further in Sections 11.3.2 and 11.7.0.

35 **11.1 Closure Plan Overview**

36 Mixed waste will be handled and stored in the following areas of the WTP, as identified in the Dangerous
37 Waste Permit (DWP) ~~and Chapter 4~~:

- 38 • Pretreatment Plant Building.
- 39 • WTP portion of the waste transfer lines from the Double-Shell Tank (DST) System.
- 40 • Intra-facility transfer lines between WTP buildings.
- 41 • WTP portion of the effluent transfer lines from the WTP to the Liquid Effluent Retention Facility
42 (LERF).
- 43 • Low Activity Waste (LAW) Vitrification Building.
- 44 • High-Level Waste (HLW) Vitrification Building.
- 45 • Laboratory.

- 1 • Effluent Management Facility (EMF).
- 2 • Failed Melter Storage.

3 The permitted DWMUs in the WTP are listed in Chapter 1, “Part A Form” and identified discussed in
 4 detail in the following DWP Chapters and will be closed in accordance with WAC 173-303-610(3)(a)(i):
 5 Chapter 4.

- 6 • 4.0, “Process Information.”
- 7 • 4D, “Pretreatment Facility (PTF).”
- 8 • 4E, “Low-Activity Waste (LAW) Vitrification Facility.”
- 9 • 4F, “High-Level Waste (HLW) Vitrification Facility.”
- 10 • 4G, “Direct-Feed Low Activity Waste (Effluent Management Facility).”
- 11 • 4H, “Analytical Laboratory (LAB).”

12 The WTP permitted DWMUs, including ancillary equipment, secondary containment areas, supporting
 13 structures and underlying soil, are addressed in this Closure Plan. Closure of the pipelines connecting the
 14 WTP with the DST system unit and the LERF/Effluent Treatment Facility (ETF) will be integrated with
 15 those respective facilities. Closure criteria will be developed jointly by United States Department of
 16 Energy (DOE), its contractors, and Ecology prior to initiating closure activities. DOE will be responsible
 17 for implementing the cleanup standards.

18 The Closure Plan indicates several potential Hanford Treatment, Storage, and Disposal (TSD) units that
 19 may be used to manage dangerous and mixed wastes generated during closure of the WTP permitted
 20 DWMUs. These identifications are preliminary and are subject to change as the Hanford Facility is
 21 developed, and as the Hanford Facility Dangerous Waste Permit (Ecology 2009) is modified in the future.

22 The remainder of the Closure Plan provides the following information:

- 23 • Section 11.2.0 of the Closure Plan identifies the regulatory standards that apply to closure, and
 24 the processes to be used for developing specific cleanup standards that may be achieved during
 25 closure.
- 26 • Section 11.3.0 describes the overall approach for removing the mixed waste inventory, flushing
 27 and decontamination operations, removing and disposing of contaminated equipment and
 28 residues, and inspections and sampling to verify clean closure.
- 29 • Section 11.4.0 describes other activities, including certification of completion of closure, control
 30 of run-on and runoff during closure, and equipment reuse.
- 31 • Section 11.5.0 provides the maximum possible mixed waste inventory.
- 32 • Section 11.6.0 describes the closure procedures for each type of permitted DWMU.
- 33 • Section 11.7.0 provides the schedule for closure.
- 34 • Section 11.8.0 describes the demonstration required to support a request to extend the standard
 35 90- and 180-day mixed waste removal and closure completion time limits, as specified in
 36 WAC 173-303-610(4)(a) and (b).

37 11.1.1 Closure Plan Revisions

38 Clean closure is the goal for the WTP permitted DWMUs. The Closure Plan will be revised if efforts to
 39 achieve the clean closure standards are unsuccessful. The WTP may also be closed as a landfill, as
 40 provided in WAC 173-303-610, if the clean closure standards cannot be achieved through the removal of
 41 radiological contamination levels and the closure performance standards cannot be achieved. The revised
 42 Closure Plan will be accompanied by a written request for modification of the permit.

1 The design life of the WTP is 40 years after the initiation of waste treatment operations. The actual
2 operating life of the plant may change depending on expansion in treatment capacity, improvements in
3 treatment technology, or many other factors. The Closure Plan will be revised and submitted for approval
4 under WAC 173-303-830 (Permit Changes) to incorporate future advances in decontamination
5 technology, changes in plant capacity, newly designated dangerous waste, or other factors that may affect
6 the closure of the WTP permitted DWMUs.

7 The Closure Plan ~~will~~may also be revised before the start of closure work, based on relevant information
8 from the operational history of the WTP and the permitted DWMUs, and when information such as
9 decontamination and access of high rad areas becomes available. Since the facility has not operated yet,
10 the final revised Closure Plan will provide the necessary final detailed decontamination schedule and
11 procedures, sampling and analysis plan, health and safety plan, interface with DST system unit and
12 LERF/ETF Closure Plans, and additional information dependent on future conditions, as indicated in the
13 following pages. In addition, the final closure plan will be updated to identify each DWMU, or group of
14 like DWMUs, previous spills and the cleanup of the spills, unexpected events prior to closure which will
15 impact closure, and an updated closure schedule. Also, if necessary, a Post-Closure Plan presenting
16 details of any post-closure processes and activities will be submitted to Ecology in accordance with
17 WAC 173-303-610(8).

18 If an unexpected event occurs during closure that affects the closure plan, a permit modification request to
19 amend the closure plan will be submitted to Ecology within 60 days of the unexpected event in
20 accordance with WAC 173-303-610(3)(b)(iii).

21 11.2 Closure Performance Standard

22 The WTP permitted DWMUs will be closed in accordance with the requirements of Conditions II.J and
23 III.10.C.8 of the Hanford Facility Dangerous Waste Permit (Ecology 2009). Clean closure requires
24 decontamination or removal and disposal of dangerous/mixed waste, waste residues, contaminated
25 equipment, soil, or other material, in accordance with the clean closure performance standards of
26 WAC 173-303-610(2). Clean closure as described in this Closure Plan will accomplish the following:

- 27 • Minimize the need for future maintenance.
- 28 • Control, minimize, or eliminate, to the extent necessary to protect human health and the
29 environment, post-closure escape of dangerous waste, dangerous constituents, leachate,
30 contaminated runoff, or dangerous waste decomposition products, to the ground, surface water,
31 groundwater, or the atmosphere.
- 32 • Return the land to the appearance and use of the surrounding land areas to the degree possible
33 given the nature of the previous dangerous waste activity.

34 Activities beyond that point will be decided and documented in the revised plan prior to closure. The
35 WTP buildings will not be used for RCRA-regulated TSD activities following clean closure, unless a new
36 permit is issued.

37 The appearance of the land where the WTP buildings are located will be consistent with the appearance
38 and future use of the surrounding processing land areas, after completion of clean closure activities. The
39 WTP buildings will remain at the site until final disposition is determined and implemented. The WTP
40 buildings may be demolished, if the buildings will have no future mission. Future land use decisions may
41 be considered during the WTP decommissioning process. The final decision on building disposition and
42 the appearance and use of the plant area will be integrated with the decisions on disposition of the
43 buildings in the adjacent 200 East Area.

1 The long-term future use of the WTP site and the adjacent 200 Areas was addressed in the *Final Hanford*
2 *Comprehensive Land-Use Plan Environmental Impact Statement* (DOE 1999). The Central Plateau as
3 defined in that document includes the United States Ecology commercial waste disposal facility, the DOE
4 Environmental Restoration and Disposal Facility (ERDF), and the 200 West and 200 East Areas, as well
5 as the WTP site.

6 Permitted units where mixed or dangerous wastes have been treated or stored will undergo closure
7 activities. Contaminated equipment, debris, and solid decontamination residues generated during the
8 closure of the WTP permitted DWMUs will be designated and packaged in accordance with the
9 appropriate regulatory requirements (expected to be the WAC Dangerous Waste Regulations in effect at
10 the time of closure). The dangerous and mixed waste will then be transferred to a permitted TSD unit
11 either on or off the Hanford Site. Equipment and debris that are not adequately decontaminated will be
12 treated to comply with land disposal restriction requirements. Liquid decontamination solutions or agents
13 generated during closure activities will be collected, designated, and disposed of at an appropriate TSD
14 unit.

15 If a product, residual waste, or decontamination fluid is spilled or released to the environment during
16 closure activities, spill response will be initiated as described in Chapter 7 “Contingency Plan,” and in
17 accordance with WAC 173-303-145(2) and 173-303-360(2)(d) reporting requirements. The residual
18 waste will be collected, designated, and managed appropriately. The waste will be managed in
19 accordance with the appropriate regulatory requirements.

20 Clean Debris Surface

21 This Closure Plan proposes use of a “clean debris surface,” defined in the following paragraph, as the
22 clean closure performance standard for the WTP metal structures and equipment and concrete structures
23 that will remain after closure, as well as all of the DWP equipment used for waste management;
24 attainment of a clean debris surface can be verified visually in accordance with the standard in
25 WAC 173-303-610(2)(b)(ii), incorporating 40 Code of Federal Regulations (CFR) 268.45, Table 1,
26 footnote 3, which states:

27 “Clean debris surface” means that the surface, when viewed without magnification, will
28 be free of all visible contaminated soil and hazardous (dangerous) waste except that
29 residual staining from soil and waste consisting of light shadows, slight streaks, or minor
30 discolorations, and soil and waste in cracks, crevices, and pits may be present provided
31 that such staining and waste and soil in cracks, crevices, and pits will be limited to no
32 more than 5% of each square inch of surface area.

33 The clean debris surface standard will be achieved by using the physical and chemical extraction
34 techniques identified in 40 CFR 268.45, Table 1, incorporated by reference WAC 173-303-140. The
35 primary method of decontamination may be water washing, followed by a choice of using chemical
36 decontamination solutions, ultrahigh-pressure water technologies, impact technologies such as sand
37 blasting and CO₂ blasting, or other new technologies that may be developed prior to closure. Also, to
38 meet this standard the surface layer may be need to be removed using mechanical equipment such as
39 striking piston heads, saws or rotary grinding wheels, or scabbling equipment. The concrete surface will
40 then be examined to meet the requirement for clean debris surface. These physical extraction methods
41 that remove up to 0.6 cm of concrete will be used only after the previous technologies have failed to result
42 in a clean-debris surface, or if there has been a failure of the coated concrete surface. Visual verification
43 may be performed by direct worker observation with written inspection documentation (Figure 11-1,
44 Sample Clean Debris Surface Checklist), or by other means such as remote-operated closed circuit
45 television (CCTV) and videotape.

1 Concrete surfaces may be protected with a contamination-resistant protective coating. Protective coatings
2 in good condition may be decontaminated using one of the technologies described above, then inspected
3 to determine if a clean debris surface is present in the same manner as steel or other metal surfaces. If
4 there is evidence that a dangerous/mixed waste release has occurred, such as confirmation of
5 contamination behind a stainless-steel lined breach or identification of damaged or deteriorated protective
6 coating on a concrete floor where a dangerous/mixed waste release has occurred, and if the concrete is
7 adjacent to soil, a contamination investigation may be performed.

8 If the concrete protective coating exhibits more damage than hairline cracks and has lost integrity, the
9 concrete surface under the deteriorated coating will be treated with aggressive physical extraction
10 technologies, such as high pressure water or scabbling, to remove at least 0.6 cm of material below the
11 original surface. This approach also applies to uncoated concrete behind or beneath stainless-steel liners.
12 The exposed concrete will again be inspected to verify that the clean debris surface standard is met. The
13 treatment will be repeated until the clean debris surface standard is met. Closure standards for soil
14 underlying the WTP are addressed in Section 11.2.1.

15 If the clean debris surface standard as described cannot be performed or cannot not be achieved, an
16 alternative method will be proposed in the revised Closure Plan as required by DWP Conditions
17 III.10.C.8.c and III.10.C.8.d.

18 Risk Based Clean Up Standard

19 Some waste handling equipment metal surfaces cannot be visually inspected (for example, internal pipe,
20 pump, and tank surfaces). A component or portions of a component may be flushed with
21 decontamination solutions if it cannot be decontaminated to meet the clean debris surface standard, or if it
22 cannot be inspected to verify that it meets the standard. The decontamination solution, or rinsate, will be
23 sampled and analyzed using methods complying with *Test Methods for Evaluating Solid Waste, Physical*
24 *Chemical Methods* (EPA 1986) for indicator constituents. Analytical data that meet the criteria defined in
25 WAC 173-303-610(2)(a) and (b) will indicate successful decontamination and attainment of the clean
26 closure performance standard. The rinsate analysis criterion is hereafter referred to as the risk based clean
27 up standard.

28 Closure Strategy for Tank Systems

29 The general closure strategy for tank systems is outlined in flowcharts in Figures 11-2 and 11-3.
30 Triple-rinsing followed by visual inspections is an accepted method of decontaminating tanks. However,
31 modification of this technique may be necessary, if determined at a later date.

32 Figure 11-2 shows that internal flushing and decontamination of tanks and ancillary equipment,
33 inspection of the secondary containment area, and sealing of observed stainless-steel lined breaches will
34 be performed prior to final decontamination efforts. Disposition of solid and liquid treatment residuals is
35 shown only at the initial flushing step (below “flush tanks, piping”), to avoid unnecessary complexity in
36 Figure 11-2. The residuals from the following internal and external decontamination steps are expected to
37 follow the same paths.

38 The two “more decon?” decision boxes in Figure 11-2 (following determinations that decontamination
39 efforts so far have been inadequate) are the symbols for the key decisions the future closure managers
40 may have to make:

- 41 1 Perform additional decontamination to meet the clean closure standard.
- 42 2 Stop decontamination and designate that tank or ancillary equipment as mixed waste debris to be
43 removed, reduced in size, encapsulated, packaged, and disposed.

1 Figure 11-2 does not show that additional decontamination of external tank or other surfaces may be
2 required to continue on the disposal path (after “remove, dispose of as mixed waste”) because such
3 additional decontamination, if required, will be due to radiological dose concerns, not dangerous/mixed
4 waste requirements. Figure 11-2 also illustrates the assumption that internal surfaces of tanks and
5 ancillary equipment cannot be adequately or efficiently decontaminated and/or inspected to demonstrate
6 that the clean debris surface standard is met, and that the decontamination solution or rinsate risk based
7 clean up standard will apply to all internal tank system surfaces.

8 Closure Strategy for Secondary Containment Areas

9 Figure 11-3 shows the strategy for closure of secondary containment areas. These steps illustrate the
10 approach for decontaminating stainless steel liners and coated concrete surfaces. Secondary containment
11 area liner breaches may need to be sealed prior to decontamination or removal of equipment. The general
12 procedure for investigating liner breaches or breaks, and decontaminating the concrete behind or below
13 such breaches, is shown in Figure 11-3. The closure strategy for concrete with intact protective coatings
14 is straightforward. If a release of dangerous or mixed waste in the permitted unit has not been
15 documented in the facility Operating Record, and no evidence of a release is found during the initial
16 closure inspection, the assumption will be made that the concrete floor surface meets the clean debris
17 surface standard.

18 If a release has been documented, and the concrete does not meet the clean debris standard,
19 decontamination technologies, as described in Section 11.2-9, will be performed until the clean debris
20 standard can be met and documented.

21 If evidence is found that a release has occurred on a concrete floor where the protective coating has even
22 minor cracking, physical extraction will be required. Physical extraction of the concrete surface may also
23 be required if sampling of the area determines there is dangerous waste contamination in areas where the
24 protective coating is substantially damaged or deteriorated; for example, if it is broken or peeling. The
25 extraction will be followed by an inspection and sampling of the surface to verify and document the
26 presence of a clean debris surface. If a release is documented at such a location and the concrete at that
27 location is resting on or against soil, soil sampling may be required. These steps are illustrated in the last
28 two boxes before the final decision box, “Visible Crack or Decomposed Concrete?” in Figure 11-3.

29 Closure Strategy for Soil

30 The criteria for determining whether additional soil sampling is required are shown in Figure 11-4.
31 Contaminated soil will be removed to meet risk-based concentration limits, referred to as the soil cleanup
32 limits (see Section 11.2.1). Soil sampling and analyses will be performed after removal to verify
33 compliance with the soil cleanup standard. Figure 11-4 shows the strategy for addressing potential
34 impacts to soil.

35 Compliance with this plan and attainment of the closure standards will be documented by electronic
36 media or written inspection records, such as those shown in the sample checklist in Figure 11-1, the
37 example Closure Certification Statement in Figure 11-5, and other supporting records as discussed in
38 Section 11.4.1.

39 **11.2.1 Closure Standards for Soils, Groundwater, Surface Water, and Air**

40 The design of the WTP mixed waste management units is intended to prevent the release of
41 dangerous/mixed waste to the soil, groundwater, surface water, or air. Clean closure of the soil beneath
42 the WTP mixed waste management units will be accomplished by demonstrating that the stainless-steel
43 process cell liners, and the coated concrete walls and floors in the secondary containments, have not lost
44 integrity and have therefore prevented contaminants from reaching the soil. If loss of secondary
45 containment integrity has occurred, the potential for soil contamination will be investigated.

1 The demonstrations will consist of performing and documenting inspections and decontamination work,
2 and soil sampling and removal, if necessary.

3 The need for sampling of soil will be determined on a unit-specific basis in accordance with
4 WAC 173-303-610(2)(b)(i), and will take into consideration the mixed waste management unit operating
5 history.

6 Where a dangerous/mixed waste release is known or suspected to have occurred, the following conditions
7 indicate probable secondary containment failure and potential soil contamination: the observation of
8 potential through-thickness cracks or crumbling concrete at a liner breach location or in a secondary
9 containment area with deteriorated concrete floor coating. Potential soil contamination will be
10 investigated through coring and sampling of both the concrete and the soil. Biased sampling will be
11 focused in the vicinity of the liner defect or coating defect, concrete cracks, or in the known or suspected
12 release location. Samples will be analyzed for constituents of concern (COCs). The proposed COCs will
13 be submitted to Ecology with the revised Closure Plan submitted before the start of closure. The COCs to
14 be used will be developed using process knowledge, Operating Record, and waste characterization
15 analyses, whenever possible.

16 The appropriate risk-based cleanup standard will be consistent with the future land-use classification.
17 The standard will be reviewed prior to initiating closure to ensure it is still appropriate. Clean closure
18 concentration limits for soils will be established in accordance with WAC 173-303-610(2)(b)(i). Given
19 the long operating life of the WTP and the current state of assumptions for toxicity data, and regulatory
20 guidance, calculation of specific limits is not appropriate at this time.

21 In establishing soil clean closure concentration limits, consideration will also be given to “area
22 background,” as defined in Ecology's *Guidance on Sampling and Data Analysis Methods* (Ecology 1995)
23 and in accordance with WAC 173-303-610(3)(a)(v). The *TWRS Phase 1 Privatization Site*
24 *Preconstruction Characterization Report* (HNF 1998), the *Hanford Site Background Part 1, Soil*
25 *Background for Nonradioactive Analytes* (DOE/RL 1995), or other site-specific soil background
26 information will be used to assist in determining background levels in the soil. If the closure soil sample
27 data are at or below the calculated soil cleanup levels, or the site-specific background concentrations,
28 whichever is greater for each constituent, the soil will be considered clean-closed.

29 Due to the level of secondary containment provided at the WTP, non-permitted releases of
30 dangerous/mixed wastes to soil, groundwater, surface water, or air are not anticipated.

31 Areas in which soil could have become contaminated will be mapped during the liner or concrete
32 secondary containment area inspection and decontamination process. Soil sampling is addressed in
33 Appendix A, *Sampling and Analysis for Closure of WTP Facility* (SAP). As necessary, a more detailed
34 sampling and analysis plan may be included in a future revision to the Closure Plan in accordance with
35 DWP Conditions III.10.C.8.c and III.10.C.8.d. The revised Closure Plan will be submitted to Ecology for
36 review and approval prior to the initiation of closure. The current SAP is consistent with the *Guidance*
37 *for Clean Closure of Dangerous Waste Units and Facilities* (Ecology 2005), as incorporated by reference
38 at WAC 173-303-140(2)(a).

39 **11.2.2 Closure Standards for Decontamination of Structures and Equipment**

40 Some of the dangerous/mixed waste-contaminated structures and ancillary equipment that will undergo
41 decontamination during the closure of the WTP consist of equipment with smooth metal surfaces.
42 Concrete and protective coating surfaces in secondary containment areas with stainless-steel liners will
43 also be decontaminated as part of closure. The types of structures and associated equipment that may be
44 decontaminated to meet the clean debris surface standard include, but are not limited to:

- 45 • Interior and exterior tank and pipe surfaces.
- 46 • Secondary containment area stainless steel liners.

- 1 • Uncoated concrete floors and walls behind stainless-steel liners.
- 2 • Coated concrete walls and ceilings above stainless-steel lined secondary containment, as
- 3 necessary.
- 4 • Coated concrete floors in secondary containment areas.

5 Decontamination of interior surfaces of tanks and pipes and documentation that they meet the clean debris
6 surface standard may or may not be possible, given the current state of decontamination and inspection
7 technologies. At present, the available equipment may not be adequate to remove hardened waste or
8 contaminated corrosion coatings from relatively inaccessible interior tank and pipe surfaces. Similarly,
9 available video equipment may not provide the inspection capability necessary to demonstrate attainment
10 of the clean debris surface standard on interior surfaces. The criteria for whether or not decontamination
11 is possible will be developed and submitted for approval prior to initiating closure activities. In addition,
12 for areas such as the PT and HLW Facility Black Cells and Hot Cells, they are currently provided with
13 spare penetrations that can be used for spray wands if needed during closure activities to facilitate
14 dangerous waste decontamination. If, after decontamination, safe physical access in black cells is not
15 available to perform visual verification during the closure period to determine if the use of the clean
16 debris surface standard, which requires visual verification, other technologies such as remote operated
17 CCTVs may be used.

18 Decontamination of equipment and stainless-steel lined secondary containment or liners will be
19 conducted by using water washing and spraying or ultrahigh-pressure water jetting, or other technologies
20 listed in Section 11.3-0. Residues from these extraction operations will be collected, sampled in
21 accordance with WAC 173-303, and transferred to a TSD facility such as the LERF/ETF or the Central
22 Waste Complex (CWC) for treatment, storage, and/or disposal.

23 Decontamination of intact secondary containment protective coating surfaces on concrete to meet the
24 clean debris surface standard will also be performed primarily through water washing and spraying.
25 Additional technologies that may be used include chemical decontamination solutions, ultrahigh-pressure
26 water technologies, impact technologies such as sand blasting and CO₂ blasting, or other new
27 technologies that may be developed prior to closure. The secondary containment protective coating on
28 concrete is designed and applied to provide a durable, non-porous surface. If decontamination of the
29 impermeable protective coating surface in secondary containment areas cannot be completed through
30 chemical extraction, or if the protective coating has broken, cracked, or peeled away from the concrete,
31 then at least 0.6 cm (0.24 inches) of the underlying concrete will be removed using one or more of the
32 physical extraction technologies. The physical extraction performance standard for concrete is removal of
33 0.6 cm of the surface layer and treatment to a clean debris surface, as noted in the *Guidance for Clean*
34 *Closure of Dangerous Waste Units and Facilities* (Ecology 2005), Section 5.6, and as noted in
35 40 CFR 268.45, Table 1, as incorporated by reference at WAC 173-303-140(2)(a).

36 Metal surface areas of equipment that cannot be documented to meet the clean debris surface standard
37 may be decontaminated using water washing, followed by a choice of chemical decontamination
38 solutions, ultrahigh-pressure water technologies, impact technologies such as sand blasting, or other new
39 technologies that may be developed prior to closure. Rinsate may be sampled and analyzed, using
40 methods complying with *Test Methods for Evaluating Solid Waste, Physical Chemical Methods*
41 (EPA 1986) for Ecology-approved indicator constituents. If other analytical methods are developed and
42 chosen for use, the Closure Plan will be revised and submitted for approval. Indicator will be determined
43 on the basis of process knowledge, Operating Record, and waste characterization analyses, whenever
44 possible.

1 Analytical data less than risk-based limits will indicate successful decontamination and attainment of the
2 clean closure performance standard for the tank, piping, or other metal structures and equipment.
3 Documentation of the sample and laboratory quality control and quality assurance data will be entered
4 into the closure record as specified in Sections 11.3.4 and 11.4.1. Concrete and protective coated
5 concrete surfaces will not be addressed using risk-based limits.

6 If the metal structure or equipment cannot be considered decontaminated using the clean debris surface or
7 risk-based limit criteria, or if further decontamination is determined to be impractical due to high
8 radiation levels, waste minimization, cost considerations, or other reasons, it will be packaged using the
9 debris treatment standard for immobilization by encapsulation. The waste will be designated on the basis
10 of process knowledge and transported to a permitted dangerous or mixed waste disposal facility such as
11 Hanford Low Level Burial Ground (LLBG) mixed waste trenches. Examples of equipment that may
12 undergo encapsulation and disposal include, but are not limited to:

- 13 • Tanks and pipes.
- 14 • Melter off-gas duct work, scrubber, condenser, precipitator, and washout holding vessels.
- 15 • Pumps, agitators, wash rings, and ejectors.

16 Contaminated items and solid decontamination residues removed from the WTP permitted DWMUs will
17 be designated, packaged, and treated as necessary to meet the waste acceptance criteria of the receiving
18 facility. Sampling of items and solid residues known to be contaminated and intended for disposal is not
19 necessary if process knowledge is adequate to accurately designate the wastes with the proper dangerous
20 waste identification codes. The Closure Plan will be revised prior to start of closure and will address
21 treatment and disposal plans in more detail.

22 **11.2.3 Closure Standards for Tank Systems**

23 At closure of a tank system, the owner or operator is required by WAC 173-303-640(8)(a) to remove or
24 decontaminate dangerous/mixed waste residues, contaminated secondary containment system components
25 (such as liners), contaminated soils, and structures and equipment contaminated with dangerous/mixed
26 waste, and manage them as dangerous/mixed waste, with few exceptions.

27 For the purposes of the WTP RCRA closure, the standard is interpreted to mean that each tank and
28 associated ancillary equipment, including the secondary containment area, will meet the clean debris
29 surface standard and/or risk-based limit criteria for rinsate. Indicator constituents or COCs to be used for
30 rinsate evaluation will be determined using process knowledge, including consideration of the available
31 waste characterization data, and other relevant information in the facility Operating Record.

32 Inspectable surfaces may be declared clean if they meet the definition of a clean debris surface, including
33 portions of concrete secondary containment with intact protective coating surfaces, and
34 physically-extracted concrete surfaces behind stainless-steel lined breaches, or under abraded or loose
35 protective coating that have had at least 0.6 cm of material removed from the original surface. Rough or
36 inaccessible metal surfaces such as corroded tank secondary containment area liner surfaces, or tank and
37 pipe interior surfaces, may be declared clean when the decontamination solution sample is analyzed, with
38 appropriate quality control and quality assurance as noted in Section 11.3.4, and the indicator parameter
39 or COC data are determined to be less than or equal to the risk-based limits.

40 If decontaminating a tank system in place is not feasible or is ineffective, an alternative method is to
41 remove the tanks, disassemble them, and decontaminate the tank parts using extraction technologies
42 described under alternative treatment standards for hazardous debris (40 CFR 268.45), as incorporated by
43 reference at WAC 173-303-140(2)(a). With Ecology's concurrence, the decontaminated debris can then
44 be disposed of as non-dangerous (but possibly controlled as radioactive) waste, as indicated in Section 5
45 of *Guidance for Clean Closure of Dangerous Waste Units and Facilities* (Ecology 2005).

1 Tank systems will be inspected for compliance with the clean debris surface standard by observing the
2 external and internal metal surfaces. Portions of a tank system that cannot be fully inspected (such as
3 interior surfaces of tanks and attached piping, pumps, ejectors, and welded pipe connections or
4 penetrations) or that may pose As Low as Reasonably Achievable (ALARA) compliance problems, may
5 be decontaminated with chemical or physical extraction technologies. The decontamination solutions
6 from these portions of the system will be sampled and analyzed for indicator parameters, and the results
7 will be compared to waste risk-based limits. Solid residues will be removed, containerized, designated,
8 and disposed of at a permitted disposal facility as required. The tank or ancillary equipment, if not
9 decontaminated to meet clean debris standard, will be removed, treated as necessary, and disposed of in a
10 permitted landfill. Treatment may include macro-encapsulation or micro-encapsulation, or other
11 processes that comply with land disposal restrictions.

12 Standards for clean closure of tank system secondary containment are identical to standards for
13 decontamination of secondary containment areas for the container storage, containment building, and
14 miscellaneous units; that is, clean debris surface standard and/or risk-based limits.

15 The proposed COCs will be submitted to Ecology and finalized in the revised Closure Plan to be
16 submitted before the start of closure.

17 **11.2.4 Closure Standards for Container Storage Areas**

18 In addition to the requirements of WAC 173-303-610, WAC 173-303-630(10) requires that at closure,
19 dangerous/mixed waste and residues will be removed from the secondary containment system.
20 Remaining containers, liners, bases, and soil contaminated with dangerous/mixed waste or residues will
21 be decontaminated or removed.

22 Standards for clean closure of container storage secondary containment are identical to standards for
23 decontamination of secondary containment areas for the tank system, containment building, and
24 miscellaneous units (that is, clean debris surface standard and/or risk-based limits). Special requirements
25 for clean closure of several secondary containment areas with coated concrete floors were explained in
26 Section 11.2.2.

27 **11.2.5 Closure Standards for Containment Buildings**

28 At closure of a containment building system, the owner or operator is required by WAC 173-303-695
29 [incorporating 40 CFR 264.1102(a)] to remove or decontaminate dangerous/mixed waste residues,
30 contaminated secondary containment system components (such as liners), contaminated soils, and
31 structures and equipment contaminated with waste and leachate, and manage them as dangerous waste,
32 unless WAC 173-303-070(2)(a)(ii) applies.

33 Standards for clean closure of containment building units are identical to standards for decontamination of
34 secondary containment areas for the tank system, container storage, and miscellaneous units (that is, clean
35 debris surface standard and/or risk-based limits).

36 **11.2.6 Closure Standards for Miscellaneous Units**

37 The owner or operator is required by WAC 173-303-680(2) to close miscellaneous units in a manner that
38 will ensure protection of human health and the environment. Miscellaneous units at WTP include, but are
39 not limited to, melters, scrubbers, condensers, precipitators, reboilers, oxidizers, adsorbers, and filters.
40 The LAW and HLW melters will be removed and replaced several times during the operational life of the
41 WTP. Removal and replacement are not considered closure or partial closure activities. Melters may be
42 replaced according to the schedule based on the design life of the melter components, or replaced when
43 unplanned failure of a component occurs. In either case, ancillary equipment will be removed or
44 disconnected from the melter after molten glass has been removed to the maximum practical extent.

45 Openings to the LAW Locally Shielded Melter (LSM) will be sealed and the melter will be removed from
46 the LAW vitrification building, after surface decontamination, as a single container.

1 Spent HLW melter will be placed in a specially designed shield overpack and then removed from the
2 HLW vitrification building to a disposal facility. Failed melter will be placed in the WTP failed melter
3 storage building (container storage area).

4 Spent LAW and HLW melter may also be stored in the WTP failed melter storage building (container
5 storage areas) if necessary to accommodate scheduling of treatment and disposal operations, or for other
6 reasons. The melter will be shipped to permitted treatment and disposal facilities. Standards for clean
7 closure of the miscellaneous unit secondary containment areas are identical to standards for
8 decontamination of secondary containment areas for the tank system, container storage, and containment
9 building units (that is, the clean debris surface standard and/or risk-based limits).

10 **11.3 Closure Activities**

11 This section describes closure activities that will be conducted to meet the clean closure performance
12 standards. Details provided here may change, and if necessary, the plan will be revised to reflect those
13 changes. The facility is scheduled to close at the end of its operating life. If the WTP is shut down prior
14 to this time, an updated Closure Plan will be submitted prior to start of closure activities. If partial
15 closures of the WTP mixed waste management units are necessary, updates to the Closure Plan will be
16 submitted prior to initiating closure activities.

17 Section 11.3.1 describes the maximum extent of operations. Section 11.3.2 describes the process for
18 removing dangerous (mixed) wastes from permitted units. Section 11.3.3 identifies several chemical and
19 physical extraction technologies that may be used to achieve the clean debris surface standard. Section
20 11.3.4 describes the approach for verification sampling and analysis to confirm that decontamination
21 and/or removal activities have attained the risk-based limit standard. Section 11.4.0 describes the
22 procedures to be followed in order to comply with closure certification requirements, to control run-on
23 and runoff during closure, and to reuse equipment from the plant. Section 11.5.0 provides the estimated
24 maximum mixed-waste inventory for each type of dangerous/mixed waste management unit.

25 Section 11.6.0 describes how each of the four types of permitted units will be closed. The goal for
26 closure of the WTP permitted DWMUs is clean closure, which is contingent on achievement of the clean
27 debris surface standard or verification that indicator constituents in decontamination solutions from the
28 permitted DWMUs are not present in concentrations above risk-based limits.

29 Partial closure may be considered for some of the mixed waste management units; that is, one or more
30 treatment processes or tank systems may be closed prior to the start of closure of the entire plant. Closure
31 of a single mixed waste management unit or group of units could be necessary if a process were to be
32 redesigned, eliminating the previous functions of the permitted DWMUs. Abnormal occurrences could
33 also force partial closure, such as plugging of a tank or piping. Partial closures of the plant are not
34 planned but could result from unforeseen circumstances. The Closure Plan will be revised to address the
35 specific details for the permitted DWMUs if partial closure is necessary, and the revised plan will be
36 submitted to Ecology for review, approval, and incorporation into the permit prior to start of closure
37 activities.

38 The following assumptions were made in developing the Closure Plan:

- 39 • The maximum inventory will be present approximately nine months or more before the start of
40 the closure period. This is the case because of the batch nature of the entire WTP treatment
41 scheme. The treatment systems within the WTP will operate normally until the last portions of
42 this final transfer are treated.
- 43 • The Pretreatment Building and the HLW melter will treat mixed waste and may be fully
44 operational at the start of the closure period. These portions of the WTP will continue to operate
45 during the closure period until the tank system flush solutions and residues are removed from
46 each system to the maximum practical extent and treated before final decontamination begins.

- 1 • Operating Records documenting the constituents and volumes of the mixed wastes in the storage
2 and treatment areas, and of the mixed wastes previously processed through the facility, will be
3 available. The Operating Record also will include detailed information on historical releases of
4 dangerous/mixed wastes into secondary containment areas, previous decontamination work, and
5 equipment that is present in secondary containment areas. This information will be directly
6 relevant to final detailed planning of decontamination steps and procedures, especially treatment
7 and disposal of the decontamination solutions and residues that will be generated.
- 8 • A release of dangerous/mixed wastes outside DWMU secondary containment areas will not
9 occur.
- 10 • Equipment necessary for dangerous/mixed waste removal and equipment decontamination will be
11 functional or will be repaired or replaced.
- 12 • Permitted TSD facilities will be available to receive dangerous and mixed wastes that will be
13 generated during closure.

14 Overall Closure Approach

15 After the final waste feed shipment or inventory is processed, the LAW LSM units will be closed and
16 removed from the site. Tanks and piping will be flushed. The flush solutions will be treated in the
17 pretreatment building by filtration and evaporation, and concentrated solids will be immobilized in glass
18 produced in the HLW melter. Immobilized waste may or may not be acceptable at the facilities that
19 accepted standard Immobilized Low-Activity Waste (ILAW) and Immobilized High-Level Waste
20 (IHLW) during the operating life of the WTP. Specific disposal plans for this type of waste may not be
21 finalized until submittal of the final revised Closure Plan prior to start of closure.

22 The next step in the overall closure approach is to decontaminate the WTP mixed waste management
23 units' components to the maximum feasible extent and remove components that cannot be
24 decontaminated to meet the clean debris performance standards. Contaminated components will be
25 disposed of in accordance with WAC 173-303-610(5).

26 Vitrification treatment will not be available after the last melter is shut down, near the completion of WTP
27 deactivation work. Small quantities of feed waste or flushing residues may remain in tanks after the last
28 melter is shut down, in addition to insoluble adhered coatings in piping and tanks. The remaining
29 aqueous residues may have to be transferred to the LERF/ETF or the CWC for evaporation, precipitation,
30 filtration, solidification, or other treatment.

31 General Sequence of Closure Activities

32 The general sequence of activities necessary to close permitted DWMUs within the WTP, and the basis
33 for establishing the order of performing these activities, is summarized in the following discussion:

34 **Dangerous/Mixed Waste Inventory Removal**

- 35 • Dangerous/mixed waste removal: The nonradioactive dangerous waste, if present, will be
36 removed from the WTP to minimize the possibility of release. Note: dangerous wastes may be
37 generated at the WTP throughout the closure period from maintenance activities.
- 38 • Inventory removal: The mixed waste inventory present in the WTP mixed waste management
39 units at the beginning of the closure (primarily heels in the bottoms of tanks) will be removed and
40 processed (pretreated and vitrified) to the maximum practical extent. This removal will minimize
41 the possibility for release and allow decontamination of the equipment to proceed. Tank systems,
42 miscellaneous units, and ancillary equipment will undergo flushing as part of closure activities.

1 Decontamination

- 2 • Liner inspection: After removal of mixed wastes (flushing), but before final decontamination of
3 tanks and other permitted DWMUs begins, each secondary containment area will be inspected to
4 identify potential or apparent breaks, cracks, or separation of the liner or protective coating from
5 the concrete floors and walls. These locations (if any) will be mapped and documented, and
6 sealed by welding or by application of patching or protective coating material, to prevent entry of
7 contaminants during decontamination activities.
- 8 • Decontamination: Tank systems and other equipment in the DWMUs will be decontaminated.
9 Additional chemical or physical extraction may be performed before tank systems, piping, or the
10 equipment and equipment support structures in the DWMUs are removed. Extraction will be
11 performed not only to meet clean debris standards detailed in Section 11.2.9, but also to minimize
12 the amount of mixed waste constituents that could be readily available for migration or release
13 during equipment removal.
- 14 • Equipment may be left in place as clean-closed if it can be successfully decontaminated.

15 Inspection

16 Inspection requirements during the closure process will continue until certification of completion of
17 closure is submitted to Ecology.

- 18 • Equipment inspection: Tank/miscellaneous units systems and ancillary equipment will be
19 inspected to ensure that the clean debris surface standard and/or rinsate analyses risk-based limits
20 are met. If necessary, the equipment will be identified as requiring removal, encapsulation, and
21 disposal.

22 Removal

- 23 • Equipment removal: If the permitted equipment cannot be decontaminated to meet the closure
24 performance standard, it will be removed, treated by encapsulation, and disposed at a permitted
25 facility. Size reduction treatment may also be performed.
- 26 • Permitted equipment decontamination: After the last batch of waste feed has been fully processed
27 through the WTP, the LAW LSMs will be shut down and removed. Pretreatment process vessels
28 and lines will be flushed with water or other solutions. Flushing liquids will be determined prior
29 to initiation of closure activities, and if a liquid other than water is identified for use, the Closure
30 Plan will be revised and submitted for approval prior to initiating closure activities. Flushing
31 wastes will be treated in the pretreatment evaporation, cesium removal, and ultrafiltration
32 processes. The concentrates will be transferred to a HLW melter. Water condensate will be
33 routed to the LERF/ETF. One HLW melter may be operated after shutdown of the LAW LSMs
34 to provide treatment for the solid flushing residues and evaporator concentrates. At the
35 completion of treatment operations, the HLW melter will be shutdown by procedure for melter
36 change out. The HLW failed melters will be disposed of in accordance with LDR requirements
37 and to the degree necessary to meet disposal facility waste acceptance criteria (Section 11.3.3).
38 LAW LSMs are not expected to require decontamination or size reduction treatment, other than
39 surface decontamination after the operating equipment openings are closed. Spent HLW melters
40 will be overpacked, and shipped to a permitted disposal facility.

41 Structure Decontamination

- 42 • Building structure decontamination, stainless steel-lined secondary containment areas: Liners in
43 the DWMU secondary containment areas will be decontaminated using chemical or physical
44 extraction technologies, or both. Most of the secondary containment areas in the mixed waste
45 management units will be lined with stainless steel. Coated concrete floors in secondary
46 containment areas will be decontaminated using only chemical extraction technologies, unless the

1 protective coating is damaged or deteriorated. Damaged protective coating in secondary
2 containment areas, and contaminated concrete under or behind liner breaches, will be
3 decontaminated using physical extraction technologies. Decontamination solutions may be
4 sampled to determine treatment requirements and transferred via existing pipelines to the
5 LERF/ETF if they meet the LERF/ETF acceptance criteria or to another permitted Hanford TSD
6 unit. Structure decontamination activities are described in Section 11.3.3.

- 7 • Building structure decontamination, concrete secondary containment areas: Examples of mixed
8 waste management units that have coated concrete secondary containment without stainless steel
9 include the condensate tank system, the LAW LSM gallery containment building, ILAW
10 container finishing containment building, and several secondary waste container storage areas.
11 At the time of closure, the facility Operating Record will be reviewed and each mixed waste
12 management unit will be inspected to determine if releases of dangerous/mixed wastes have
13 occurred in these areas. If a release of dangerous/mixed waste has occurred on a secondary
14 containment concrete floor where the protective coating is even slightly damaged or deteriorated,
15 the concrete in that secondary containment area will be physically extracted to remove at least
16 0.6 cm of concrete from the original surface. This effort will demonstrate compliance with the
17 clean debris surface standard. If a release is not documented or suspected, minor or hairline
18 cracks may still be accepted in determining that the clean debris surface standard is met. If the
19 secondary containment protective coating is intact, the surface may be decontaminated by
20 chemical extraction. If chemical extraction is unsuccessful, or if the coating is damaged by the
21 chemical extraction, physical extraction will be performed.
- 22 • Building examination to verify decontamination: After each mixed waste management unit in
23 each building has been decontaminated, the mixed waste management units will be inspected and
24 closure documentation will be examined to verify that the clean closure standards have been met.

25 **Soil Investigation, Removal, and Verification**

- 26 • Potentially contaminated soil identification: Areas in which soil could have become contaminated
27 will be mapped during the liner or concrete secondary containment area inspection and
28 decontamination process. Soil sampling protocols will be established and implemented if
29 potentially contaminated areas are identified.
- 30 • Soil decontamination: Soil removal will be performed if necessary. A revised Closure Plan and a
31 Post-Closure Plan per WAC 173-303-610(3) and WAC 173-303-610(7) will be submitted if
32 removal to the established risk-based standards is not feasible.
- 33 • Soil sampling to verify decontamination for indicator constituents: The soil will be sampled and
34 analyzed for indicator constituents after the contaminated soil has been removed.

35 **NOTE:** Sampling of soil to verify decontamination will be addressed per the SAP and is included as
36 Appendix A of the Closure Plan.

37 **Disposition of Decontamination Wastes**

- 38 • Disposition of decontamination fluids: Wastewater or chemical extraction solutions from
39 decontamination activities will enter an existing collection system for waste characterization and
40 verification against LERF/ETF waste acceptance criteria. At the final stage of closure, when the
41 transfer pipeline to the LERF/ETF is taken out of service, decontamination solutions may be
42 containerized and transported to the LERF/ETF by truck. Characterization of the closure residues
43 in the permitted DWMUs will be documented based on process knowledge or analysis of the
44 mixed waste treated in the units. If the wastewater cannot be accepted by LERF/ETF, it may be
45 solidified and transferred to the CWC or another available permitted unit.

- 1 • Disposition of the building air emission control equipment (i.e., heating, ventilation, and air
2 conditioning [HVAC]): Building air emission control equipment will remain in place until
3 decontamination of other WTP components meets the clean closure performance standards. The
4 HVAC equipment will be decontaminated to meet the clean closure performance standard, or will
5 be removed, designated, and packaged to meet the waste acceptance criteria of a permitted
6 disposal facility.
- 7 • Disposition of decontamination equipment: Equipment or materials used in performing closure
8 activities will be decontaminated or disposed of at a permitted disposal facility. Personal
9 protective equipment will be disposed of as appropriate.

10 The general order of closure activities was selected to minimize the potential for release of mixed waste
11 constituents by removing the bulk of the mixed waste constituents early in the closure process. This order
12 of closure also minimizes waste generation by reducing the possibility that decontaminated areas will
13 become contaminated again by ongoing closure efforts.

14 Detailed scheduling of closure activities depends on the necessary facility functions required to be
15 maintained during the closure period and the degree of contamination in each permitted DWMU,
16 especially after the mixed waste inventory is removed and decontamination activities start. The large
17 number of tank systems increases the potential for a highly complex schedule. Similar tank systems and
18 other types of permitted DWMUs may be grouped for the purpose of minimizing the bulk and complexity
19 of plans for closure activities. The detailed decontamination operations schedule will be included in the
20 revised Closure Plan to be submitted before the start of closure activities (see Section 11.7-9).

21 Work will be performed in a manner that minimizes worker exposure to dangerous and/or mixed waste or
22 other workplace hazards and will meet the ALARA principles.

23 Additional detail will be provided describing waste removal, equipment decontamination, and
24 closure-generated dangerous/mixed waste disposal activities in the revised Closure Plans to be submitted
25 prior to start of closure.

26 **11.3.1 Maximum Extent of Operations**

27 The maximum extent of operations during the active life of the WTP corresponds to the maximum mixed
28 waste inventory with full feed tanks, the melters operating at design capacity, and full storage areas.

29 The general arrangement drawings in Chapter 4 show the locations of tanks, melters, miscellaneous units,
30 containment buildings, and container storage areas. The dimensions of the permitted dangerous/mixed
31 waste management units are included in Chapter 4 tables.

32 **11.3.2 Removing Dangerous/Mixed Waste**

33 The mixed waste feed inventory present in the WTP after the final receipt of waste feed from the DST
34 system unit will be processed before the start of the first phase of closure. The mixed waste will be
35 removed from tank systems to the maximum practical extent. Removal will be continued by processing
36 the last bulk volumes of waste feed through the applicable Pretreatment and vitrification systems, and
37 transferring treated ILAW and IHLW to other TSD units or facilities from the container and canister
38 shipping docks. These activities will follow normal operating procedures.

39 The following description of mixed waste removal is intended to provide a brief overview of the WTP
40 permitted DWMUs closure activities.

41 At the completion of mixed waste treatment operations, DOE and its contractor will close the permitted
42 DWMUs and deactivate the WTP facilities. Deactivation, when completed, will leave the facilities in a
43 safe, stable, and passive state that can be monitored with minimal cost and minimal requirements for
44 service support from either personnel or active equipment.

1 The WTP deactivation operations will comprise a large portion of the RCRA closure activities of the
2 permitted DWMUs that will occur between the start of the closure period, as defined in
3 WAC 173-303-610(3)(c)(ii), and the final shutdown of the HLW vitrification system. Closure operations
4 for some permitted DWMUs may begin before the completion of treatment of the final batch of waste
5 feed from the DST system unit.

6 Overlaps between dangerous/mixed waste management unit closure and the WTP facilities' deactivation
7 activities, and the overall TSD facility permitting process, as defined in the *Hanford Federal Facility*
8 *Agreement and Consent Order* (Ecology, EPA and DOE 2011) and the implementing attachment known
9 as the *Tri-Party Agreement Action Plan*, Section 6.3, are illustrated in Figure 11-6. The full extent of
10 necessary interfaces, and detailed definition of the intermediate points in this timeline, will not be
11 determined until deactivation and closure planning are finalized before the start of closure.

12 Vitrified waste in storage at the WTP at the start of the closure period will be shipped to disposal units on
13 the Hanford Site or to other appropriate facilities. If the inventory of untreated waste feed cannot be
14 treated at the WTP, it will be transferred to a permitted TSD facility. Circumstances under which the
15 waste feed inventory would not be treated through vitrification are not accounted for in this Closure Plan
16 and would require revision of the plan. Properly completed shipping papers and certifications, as
17 applicable, will accompany waste shipments. Once the final batch of waste feed has been processed,
18 residual heels will be flushed from the tank systems in accordance with deactivation procedures.

19 Wastewater from flushing and decontamination solutions will be filtered, evaporated, and further treated
20 as necessary in the WTP Pretreatment Building. The removed solids will be sent to the HLW melter.
21 Wastewater will be sent to the LERF/ETF for treatment if acceptance criteria is met, or it will be
22 transported to the CWC or another permitted TSD unit for storage, treatment, and disposal. Treatment in
23 containers could be performed at the WTP if necessary or preferable, and if the resulting waste will meet
24 the CWC or another TSD unit's waste acceptance criteria. The treatment in containers alternative is not
25 likely to be used, due to the relatively large volumes of flush solutions that will be generated.

26 If non-radioactive waste is present as inventory at the start of the closure period at the dangerous/mixed
27 waste container storage unit, it will be transferred to a permitted off-site facility for treatment or disposal.
28 Non-radioactive dangerous waste generated during the closure or deactivation work will be managed
29 similarly.

30 The TSD units available at the time of closure, and their waste acceptance criteria, may include additional
31 units that are not available today.

32 Complete records will be kept as to the date of shipment, waste characterization, waste quantity,
33 destination facility, land disposal restriction certifications and notifications, and other appropriate
34 information for removed dangerous/mixed waste. Specific documentation requirements are discussed in
35 Chapter 3A. This information will be included in the closure documentation supporting certification,
36 which is described in Section 11.4.1.

37 The specific types of off-site treatment and disposal units for dangerous wastes generated during closure
38 will be determined and provided in the revised Closure Plan to be submitted before closure begins.
39 Interfaces with the DST system unit and LERF/ETF will be specified in the revised plan to be submitted
40 before the start of closure.

41 **11.3.3 Decontaminating Structures, Equipment, and Soils**

42 The only structures and equipment that may be contaminated at the start of the closure period are within
43 the DWMU secondary containment areas. Some of the types of waste handling equipment that may be
44 located in each permitted DWMU can be determined by review of the design drawings and operating
45 plans. Examples include, but are not limited to, cranes, power manipulators, and welding machines.
46 Many other types of hand tools, instruments, lights and cameras, radiation monitors, buckets, and other
47 equipment may be present in one or more DWMU secondary containment areas. If contaminated with

1 dangerous/mixed waste, these structures, tools, and equipment will be decontaminated, if feasible, using
2 one or more of the following technologies to achieve the clean closure performance standard:

- 3 • Ultrahigh-pressure water jet.
- 4 • Rotating cavitation water jet.
- 5 • Soap scrubbing and wet vacuuming.
- 6 • Steam vacuuming.
- 7 • Vacuum abrasive blasting.
- 8 • Soda blasting.
- 9 • Shot blasting.
- 10 • Ice blasting.
- 11 • Hydroblasting.
- 12 • Grit blasting.
- 13 • Cryogenic CO₂ pellet blasting.
- 14 • Sponge blasting.
- 15 • Etching.
- 16 • Rotating brushes/honing.

17 More aggressive decontamination methods may be used on concrete if it becomes necessary to remove
18 mixed waste accumulations that extend into the concrete:

- 19 • Needle scaler.
- 20 • Paving breaker or chipping hammer.
- 21 • Piston scabbler.

22 These decontamination technologies were chosen based upon demonstrated effectiveness in a radioactive
23 environment and the ability to successfully achieve the RCRA closure performance standard. These
24 technologies are covered under the generic physical or chemical extraction technology categories listed in
25 40 CFR 268.45, Table 1. This approach is consistent with Ecology guidance (Ecology 2005) to achieve
26 clean closure.

27 Specific methods of decontamination (and removal and disposal if required) of the permitted DWMU
28 components and equipment will be determined at the time of closure. These methods will be based on
29 information in the Operating Record, including historical mixed waste releases, and DOE plans for future
30 use of the buildings. The feasibility, or practicality, of decontamination depends on many factors that
31 cannot be fully defined until the Closure Plan is finalized. Decision criteria may include, but are not
32 limited to, radiation hazards, secondary mixed waste volumes, schedule and budget restrictions, and
33 availability of TSD facilities to receive secondary mixed wastes. Equipment and debris that are not
34 decontaminated will be disposed of as mixed waste.

35 Decontamination solutions from interiors of tanks, attached piping, and other equipment will be collected
36 in tank drain piping and collection tanks. Decontamination solutions from tank and pipe exterior
37 surfaces, and from decontamination of other free-standing ancillary equipment and secondary
38 containment walls and floors in the four types of permitted DWMUs will be collected in secondary
39 containment area sumps, then transferred by pumping or gravity drainage to plant wash collection tanks.
40 Exceptions to this process may include decontamination of small surface areas where drainage may be
41 captured in portable collection basins or buckets. Transfers of decontamination solutions to the
42 LERF/ETF, CWC or another on-site TSD unit, or if the waste is not a dangerous mixed waste, to an
43 off-site TSD facility, are addressed in Section 11.3.2.

1 The decontamination solutions and residues will be designated on the basis of process knowledge, or
2 sampling and analysis if necessary, and transferred by existing hard piping to the LERF/ETF. The pipe
3 connection to the LERF/ETF will be one of the last WTP components to be taken out of service, after
4 decontamination activities are complete. The last few decontamination activities may require the
5 collection of wastewater in a temporary sump and container, and will be transported by truck to the
6 LERF/ETF.

7 Solid residues will be collected into containers by vacuuming or mechanical means (such as sweeping or
8 shoveling), treated, if necessary, at the WTP, CWC, or Waste Receiving and Processing Facility to
9 stabilize or solidify the residues, and disposed in the LLBG or a permitted disposal unit on the Hanford
10 Site. Off-site mixed-waste landfill disposal facilities may be considered if an appropriate Hanford Site
11 unit is not available.

12 Contaminated debris and solid decontamination residues removed from the WTP will be designated and
13 packaged to meet the waste acceptance criteria of the receiving facility. Sampling of equipment and solid
14 residues that are known to be contaminated and are intended for disposal is not necessary, if process
15 knowledge is adequate to accurately designate the waste with the proper dangerous waste identification
16 codes. Process knowledge includes the Operating Record, which should provide adequate waste analyses
17 and waste processing histories for each permitted DWMU in the WTP.

18 Information to support disposal of melters and other debris will be provided in a revised Closure Plan to
19 be submitted before the start of closure.

20 **11.3.3.1 Secondary Containment Structures and Associated Equipment**

21 Within most of the process areas, stainless steel liners supported by steel reinforced concrete structures
22 provide secondary containment for the process tanks, miscellaneous units, HLW melters, LAW melters,
23 and ancillary equipment. Coated concrete surfaces (the walls and ceilings above the liners) in lined
24 mixed waste management areas are not part of the required dangerous waste secondary containment
25 structure, although additional controls may be provided for splashes and airborne contamination.
26 Concrete in stainless-steel lined permitted secondary containment areas, where control of splashes,
27 washdown sprays, or airborne contamination is necessary, will be coated during construction with a
28 durable chemical-resistant impermeable protective coating. Top edges of the liner plates in these
29 secondary containment areas will be sealed to the concrete surface.

30 Steel liners and coated concrete surfaces will be inspected visually. The visual inspection may be
31 conducted remotely using CCTV. The purpose of the inspections will be twofold: to identify and map
32 cracks that might provide a migration pathway for contaminants and to identify areas that are potentially
33 contaminated with mixed waste or waste residues.

34 Identified cracks in secondary containment areas will be sealed to prevent infiltration of decontamination
35 solutions between the stainless steel liner and the concrete, or migration into cracks in concrete. Coated
36 concrete and liner surfaces will be decontaminated to achieve the clean debris surface standard using
37 chemical extraction, or if necessary, through physical extraction as described in Section 11.2.0.

38 Secondary containment areas with concrete surfaces are eligible for decontamination by chemical
39 extraction only if the protective coating is intact. Minor cracking in the protective coating will not
40 disqualify the concrete surface from being eligible for classification as a clean debris surface, if that
41 surface has not been directly exposed to dangerous waste as a result of a container leak or some other
42 release mechanism. The facility Operating Record will be consulted before decontamination work begins
43 to identify those permitted DWMUs where leaks or other dangerous/mixed waste releases have occurred.
44 These permitted secondary containment areas will also be visually inspected to determine whether the
45 protective coating is intact, and whether undocumented evidence of a mixed waste release is present.

1 Secondary containment areas with intact protective coatings may be decontaminated with water washing
2 if necessary. If additional decontamination is necessary, other technologies will be used, such as
3 chemical decontamination solutions, ultrahigh-pressure water technologies, impact technologies such as
4 sand blasting and CO₂ blasting, or other new technologies that may be developed prior to closure.
5 Physical extraction methods that remove up to 0.6 cm of concrete will be necessary on concrete surfaces
6 where the protective coating has peeled, bubbled, or is broken (before or after decontamination), exposing
7 bare concrete. Stainless-steel liners may also require physical extraction treatment to remove mixed
8 waste residues or corrosion. Inspections of the concrete and liner surfaces for a clean debris surface will
9 be documented in an inspection record. Details of the decontamination methods to be used will be
10 developed and submitted for approval prior to initiating closure activities.

11 Concrete and steel grinding, scaling, or scabbling residues will be collected, placed in containers, and
12 sampled and analyzed for indicator constituents (COCs). The residues will be designated based on
13 knowledge of the process or the waste that contaminated the concrete or steel.

14 The Operating Record will be reviewed prior to closure to determine if decontamination procedures
15 should be performed in any areas outside the permitted unit secondary containment areas. These areas
16 may include equipment decontamination bays or secondary containment sumps in transfer tunnels, or
17 other locations where mixed wastes may have been generated or transferred during the operating life of
18 the WTP and accidentally released. A final revised Closure Plan that includes areas identified as a result
19 of the Operating Record review will be submitted to Ecology for review and approval before closure
20 starts. Floors and walls in non-permitted areas of the building (such as offices, lunch rooms, or bulk
21 storage areas for non-hazardous materials) that do not have documented releases of dangerous or mixed
22 waste are not included in this Closure Plan.

23 **11.3.3.2 Building Air Emission Control Equipment**

24 Building air emission control (i.e., HVAC) equipment will remain in place and in operation as necessary
25 to facilitate deactivation and decontamination of the WTP. HVAC equipment will be taken out of service
26 in stages as radiological contamination is progressively removed or reduced. Compliance with applicable
27 air emission standards and permits will be maintained. Air permits for operations will be evaluated to
28 determine if they will support closure activities. The permits will be modified if necessary.

29 After completion of decontamination operations that may generate fumes, vapors, or dust that will be
30 controlled by the building ventilation system, the HVAC equipment will be decontaminated, then
31 dismantled, and reduced in size to the extent necessary to facilitate preparation for disposal. DOE may
32 determine that the HVAC equipment will remain in place after closure.

33 Modifications to air emission standards or other appropriate standards to prevent or minimize the release
34 of dangerous waste or dangerous waste constituents to the air or surrounding environment during closure
35 will be specified in the revised Closure Plan to be submitted before the start of closure.

36 **11.3.3.3 Soil**

37 Discovery of an apparent or potential breach in a cell liner or in the protective coating in unlined
38 permitted secondary containment areas, on an exterior wall, or bottom floor adjacent to soil will require
39 further investigation. The presence of soil contamination will be a unit-specific determination based on
40 WTP records and direct visual or CCTV inspection of the stainless-steel liners and concrete surfaces as
41 described in Section 11.2-θ. The liner will be removed to allow access for additional investigation and
42 decontamination if this inspection reveals areas of poor liner integrity such as severe corrosion, weld
43 breaks, or other damage to the steel. Coring and soil sampling will be performed if a liner breach or
44 damaged protective coating is found on a wall or floor adjacent to external soil and if the concrete has lost
45 integrity at that location. If the concrete is not cracked, deteriorated, or porous, and a clean debris surface
46 can be obtained by physical extraction treatment, no further investigation or soil removal may be

1 necessary. If soil is sampled, it will be analyzed for indicator constituents of concern identified on the
2 basis of the mixed wastes contained in that permitted DWMU during the operating life of the plant.

3 If soil having levels of contamination that exceed the risk-based soil cleanup levels is found, it will be
4 removed and managed as media containing dangerous waste, and will be designated and disposed of
5 accordingly at a permitted disposal facility. Soil at the limits of excavation will be sampled and analyzed
6 after removals are completed to confirm that the concentrations of dangerous waste constituents are below
7 the risk-based exposure limits. The appropriate risk-based cleanup standard will be consistent with the
8 future land-use classification from the *Final Hanford Comprehensive Land-Use Plan Environmental*
9 *Impact Statement* (DOE 1999). Risk assessment principles will be used to establish clean closure
10 concentration limits for soils in accordance with WAC 173-303-610(2)(b)(i).

11 **11.3.4 Sampling and Analysis to Identify Extent of Decontamination/Removal and to** 12 **Verify Achievement of Closure Performance Standard**

13 If there are stainless-steel lined secondary containment breaches or concrete that has lost integrity, efforts
14 to define the extent of contamination will use a graded approach using field screening and survey
15 followed by verification sampling if needed. This section is an outline for a SAP that describes the
16 approach that will be followed for verification sampling. The SAP will also assist in confirming that
17 decontamination and/or removal activities have attained the closure performance standard. Sampling may
18 be employed where the clean debris surface standard cannot be met, such as interior tank and pipe
19 surfaces, or where evidence is found indicating apparent failure of DWMU secondary containment such
20 as liner cracks.

21 However, the SAP cannot be finalized at this time because the dangerous waste COCs at each permitted
22 dangerous/mixed waste management unit and restrictions on sampling and analysis activities due to high
23 radiation levels are not adequately defined. Prior to closure, this Closure Plan will be revised to specify
24 sampling and analysis techniques in a site-specific SAP that may include: sampling to determine the
25 closure performance standards are met, specify extent of dangerous/mixed waste contamination, sampling
26 objectives, analytical parameters, sampling methods and locations, identification of sampling
27 preservation, sampling and data quality control, the evaluation and reporting of data, and the
28 chain-of-custody record.

29 Additional information, as follows, may be provided in the revised Closure Plan to be submitted prior to
30 closure:

- 31 • Health and safety plan.
- 32 • Details on sampling equipment.
- 33 • COC indicator parameters for decontamination solution analyses.
- 34 • Analytical methods that deviate from *Test Methods for Evaluating Solid Waste, Physical*
35 *Chemical Methods* (EPA 1986), if any.

36 **11.3.4.1 Sampling to Confirm Decontamination of Structures and Soil**

37 Sampling of decontamination solutions may be conducted for equipment, structures, and debris that do
38 not meet the clean debris surface standard following the decontamination process. This sampling will
39 serve to define the extent of remaining contamination or confirm adequate decontamination of equipment,
40 structures, or debris. The sampling process will be repeated after each subsequent round of
41 decontamination effort until the decontamination effort is either determined to be successful, or is
42 terminated, and the contaminated component is removed and disposed of as dangerous or mixed waste.

43 Soil found to be contaminated will be removed as part of the closure activities, and sampling will be
44 performed to confirm that levels of contamination in the remaining soil do not exceed Ecology-approved
45 risk-based soil cleanup levels. The sampling and analysis plan for WTP is referenced in Appendix A.

1 11.4 Other Activities

2 This section describes the procedures to be followed in order to comply with closure certification
3 requirements, to control run-on and runoff during closure, and to reuse equipment from the plant.

4 11.4.1 Certification of Closure

5 ~~WAC 173-303-610(6) requires that within 60 days of completion of closure activities of the permitted~~
6 ~~dangerous/mixed waste management units, a closure certification will be submitted to Ecology.~~
7 ~~Following completion of closure, DOE (or the DOE selected contractor) and an Independent Qualified~~
8 ~~Registered Professional Engineer will submit certifications that the permitted DWMUs have been closed~~
9 ~~in accordance with the approved closure plan. Within 60 days of completion of closure of each dangerous~~
10 ~~waste management unit, the owner or operator will submit to Ecology, by registered mail or other means~~
11 ~~to establish proof of receipt (including applicable electronic means), a certification that the dangerous~~
12 ~~waste management unit, has been closed in accordance with the specifications in the approved closure~~
13 ~~plan. The certification will be signed by the owner or operator and by an Independent Qualified~~
14 ~~Registered Professional Engineer (IQRPE). Documentation supporting the IQRPE's certification will be~~
15 ~~furnished to Ecology upon request.~~

16 The certifications will be submitted in accordance with the Hanford Facility Dangerous Waste Permit
17 (Ecology 2009) Condition II.1 to the following address:

18 Program Manager, Nuclear Waste Program
19 Washington State Department of Ecology
20 3100 Port of Benton Boulevard
21 Richland, Washington 99354

22 The following documentation will be prepared to support the closure certification, and will be provided or
23 accessible to Ecology on request:

- 24 • Field notes related to closure activities.
- 25 • A description of deviations from the approved Closure Plan and justifications for these
26 deviations.
- 27 • Documentation of the final disposition of dangerous wastes and dangerous waste residues,
28 including contaminated media, debris, and treatment residuals.
- 29 • Laboratory and field data (including quality assurance and quality control data) for samples and
30 measurements, including those taken to determine background conditions or to determine or
31 confirm clean closure.
- 32 • A summary report that itemizes the data reviewed by the Independent Qualified Registered
33 Professional Engineer and tabulates the analytical results of samples taken to determine or
34 confirm clean closure.

35 A draft decontamination documentation checklist and an example of RCRA closure certification
36 statement are provided in Figure 11-1 and Figure 11-5, respectively. Ecology will verify that the
37 requirements for closure certification are properly completed per WAC 173-303-610(6).

38 11.4.2 Run-on and Runoff Control

39 No runoff or run-on resulting from precipitation or surface water flows is anticipated in the areas
40 undergoing closure. The WTP permitted dangerous/mixed waste management units are enclosed within
41 highly secure reinforced concrete and steel frame buildings, with the exceptions noted below. Wash
42 water or other liquids resulting from decontamination activities will be contained by WTP containment
43 structures – floors, walls, ceilings, sumps, and catch tanks.

1 The only permitted DWMUs that may be exposed to direct precipitation are the two process condensate
2 vessels outside the pretreatment building. The failed melter storage building will be a separate
3 freestanding unit, and run-on or runoff control will be assured for this unit before and during operation of
4 the WTP, as well as during the closure period. There will be no changes in the secondary containment
5 capacities or runoff control design for this unit during closure activities.

6 Activities such as groundwater monitoring and run-on and runoff control will be described in a revision to
7 the Closure Plan prior to closure.

8 **11.4.3 Equipment Reuse**

9 Equipment may be decontaminated and reused during or after closure, if practicable. For example,
10 contaminated (radiological) material and handling equipment such as shield doors, cranes, and power
11 manipulators may be decontaminated in order to reduce radiation dose rates. This will allow initial or
12 repeated personnel entry to areas where additional decontamination, debris size reduction, or packaging
13 and encapsulation activities will be conducted. Equipment described in Sections 11.3.0 and 11.6.0 will be
14 decontaminated using methods selected from those specified under 40 CFR 268.45, or equivalent
15 technologies.

16 Criteria for determining whether equipment will be reused or disposed of include the following:

- 17 • Degree of contamination (radiological).
- 18 • The need to minimize potential worker radiation and dangerous/mixed waste exposures during
19 decontamination; the amount of decontamination residues that would be generated.
- 20 • The value of the equipment.
- 21 • Compliance with the approved schedule and budget.

22 Equipment that could be used by DOE in future operations at the WTP site, in other Hanford projects, or
23 at different DOE facilities, may be decontaminated first.

24 **11.5 Maximum Waste Inventory**

25 The estimated maximum mixed waste inventory for each type of permitted DWMU is listed in
26 Table 11-1. These are total storage capacity volumes from the WTP Part A.

27 The actual volumes present at the start of the closure period will be much less than values shown in the
28 table. For example, the containment buildings and container storage areas may be empty or nearly empty
29 on the date of completion of treatment of the final volume of waste feed, and the tank systems are not
30 likely to contain more than a few percent of the maximum capacity.

31 **11.6 Closure of Tanks, Container Storage, Containment Buildings, and Miscellaneous 32 Units**

33 This section of the Closure Plan identifies specific closure requirements for each type of permitted
34 DWMU at the WTP, and describes the removal of wastes and equipment, decontamination of the unit,
35 and disposition of decontamination residues. A summary of the closure standards and activities for each
36 type of permitted DWMU is provided in Table 11-2. The performance standards and closure activities for
37 many of the mixed waste management unit components are similar or identical for the four types of units,
38 as indicated in the table. Differences in the detailed closure procedures will be due in part to variations in
39 permitted DWMU design, and different ancillary equipment present in various units, even in units of the
40 same type. In the process cells/caves secondary containment areas for tanks or miscellaneous units, initial
41 decontamination activities will be performed remotely, while the same types of activities may be
42 performed by personnel in most of the other mixed waste management units, such as container storage
43 units.

1 An overall estimate of the volume of closure wastes to be generated has not been prepared, due to the
2 uncertainties regarding final disposition of the WTP equipment and structures. The estimate of the
3 volume of closure wastes will be provided in an amended Closure Plan and submitted for approval prior
4 to initiating closure activities. The volume of decontamination wastes that will be generated may be
5 relatively large if most of the tanks, piping and related equipment, and major portions of the concrete and
6 steel structures are removed and disposed of as waste. Volume of wastes may also be large if the same
7 equipment and structures are completely decontaminated, resulting in large amounts of secondary
8 residues, personnel protective equipment, and decontamination solutions. The volume of immobilized
9 waste that will be generated during the closure period depends in part on the composition of the final
10 batch of waste feed, which cannot be predicted at this time.

11 **11.6.1 Closure of Tank Systems**

12 Tank systems will be decontaminated using chemical and/or physical extraction technologies. Types of
13 tank systems that will be decontaminated include, but are not limited to, the following:

- 14 • LAW and HLW feed and storage tank systems.
- 15 • Evaporators and condensers.
- 16 • Waste filtration tanks.
- 17 • Ion exchange tanks.
- 18 • PTF condensate tanks.
- 19 • EMF tank systems.

20 Types of ancillary equipment that may be decontaminated include, but are not limited to, the following:

- 21 • Waste transport, rinse, and washdown piping.
- 22 • Pumps, agitators, wash rings, and ejectors.
- 23 • Air, steam, and water lines in secondary containment areas.
- 24 • Intra-facility pipelines.

25 Decontamination of tank systems including tanks, piping, and other ancillary equipment will be
26 conducted using chemical extraction technology and water washing and spraying. High-pressure steam or
27 other physical extraction technologies identified in Section 11.3.3 will also be used to remove
28 contamination if necessary. The decontamination procedures for closure of tanks will include, but may
29 not be limited to, the following:

- 30 • Tank systems will be flushed after the final batch of bulk waste has been processed through that
31 tank system. Large-volume flush solutions will remove as much waste as possible before smaller
32 scale decontamination work begins. Flush water will be transferred to the pretreatment
33 evaporation and ultrafiltration systems, and the concentrates will be sent to the HLW melter for
34 vitrification, if the HLW vitrification system is operating. (If either or both vitrification systems
35 will not be operating during the first phase of the closure period, this Closure Plan will be revised
36 to account for changes in treatment and disposal of waste feed and flushing wastes, as necessary.)
37 Water condensate from the evaporator will be routed to the LERF/ETF. The HLW melter will be
38 shut down after flushing wastes are treated. Tank decontamination activities to be performed
39 after completion of flushing may involve any of the chemical or physical extraction technologies
40 identified in Section 11.3.3. Used decontamination solutions will be transferred to the LERF/ETF
41 or another permitted TSD facility.
- 42 • Physical evidence of mixed waste contamination in the secondary containment systems may be
43 used, in addition to the Operating Record, to determine whether decontamination of the exterior
44 of a tank system is needed. Before using decontamination solutions on the outside of a tank, the
45 floor and wall liners will be inspected for cracks or other breaches. The cracks will be sealed

1 before beginning decontamination treatment, or other engineered containment devices (such as
2 collection basins) will be used to collect and contain solutions. The outer tank surface then will
3 be cleaned with water or detergents, or other technologies as necessary, and rinsed.

4 Decontamination of secondary containment for permitted DWMUs will be similar or identical to
5 the procedures used for mixed waste container storage and containment building units.

- 6 • After the tanks are decontaminated, the tank interiors may be inspected using CCTV cameras to
7 determine compliance with the clean debris surface standard. Because of possible radiation
8 exposure, visual inspection of the process cells may be performed remotely using a camera with a
9 zoom lens, or using another device that allows verification that the standard is met. Inspections
10 will be documented in an inspection record.
- 11 • The outside of the tanks also will be inspected for compliance with the clean debris surface
12 standard, and inspections will be documented in an inspection record.
- 13 • If tanks or ancillary equipment cannot be determined by visual inspection to meet the clean debris
14 surface standard, the tanks may undergo further decontamination, or rinsate samples may be
15 obtained to determine if the decontaminated tank meets the risk-based limit performance standard
16 for clean closure. Before or after decontamination efforts, a tank system may be designated as
17 mixed waste debris, removed, reduced in size, packaged, treated by encapsulation, and sent to a
18 permitted disposal facility.
- 19 • Decontamination residues will be collected, designated, and transferred to a permitted disposal
20 facility.

21 The decontamination procedures for piping and ancillary equipment will include, but will not be limited
22 to, the following activities:

- 23 • The facility design and process information, in combination with Operating Records, will be used
24 to identify the equipment associated with treatment of mixed waste. Piping that may have carried
25 mixed waste or may have become externally contaminated with mixed or dangerous waste will
26 undergo decontamination. Contaminated piping may include waste transfer piping, sump
27 contents transfer piping, nitric acid transfer piping, and other piping associated with waste
28 treatment and secondary waste transfer.
- 29 • The piping will undergo bulk flushing at the same time the tanks are flushed. Flushing of the
30 pipes and other ancillary equipment will remove the waste in order to meet the clean debris
31 surface standard. Chemical and/or physical extraction technologies may be used to attempt to
32 remove the remaining waste from piping and other ancillary equipment. Where it is not possible
33 to visually verify that the clean debris surface standard has been met, verification may be
34 attempted by rinsate sampling, analysis, and comparison of analyses with risk-based limits.
- 35 • If it is not possible to meet the clean debris surface standard or risk-based limits, contaminated
36 portions of the piping and ancillary equipment will be removed, designated as dangerous/mixed
37 waste, packaged in waste containers, transferred to the CWC or another permitted unit,
38 encapsulated, and disposed of at a permitted landfill disposal unit on the Hanford Site.
39 Encapsulation may be performed at the CWC or elsewhere.

40 **11.6.2 Closure of Container Storage Areas**

41 Each permitted mixed waste container storage unit will be evaluated for historical spills or other releases
42 of dangerous or mixed wastes by review of the facility Operating Records and by visual inspection. The
43 visual inspections will determine if the container storage unit can be declared clean using the clean debris
44 surface standard by checking for signs of any spills and/or releases of waste and loss of integrity, breaks,
45 cracks, gaps, and other signs of deterioration of container storage area floors. If the record review and
46 inspection support the conclusion that no releases of dangerous/mixed waste to the floor occurred, no
47 further decontamination or sampling work will be required for that permitted mixed waste container

1 storage unit. If either the inspection or record review indicate that dangerous/mixed waste releases to the
2 floor of a mixed waste container storage occurred, decontamination will be required. If the protective
3 coating is intact, physical extraction treatment will not be performed. If the coating is cracked or more
4 severely damaged, physical extraction treatment will be required to remove at least 0.6 cm from the
5 original surface. If the extent of the historical releases (the actual location on the floor) cannot be
6 determined, the entire floor surface of the container storage area will be treated. If the resulting surface
7 cannot be documented as a clean debris surface, the treatment may be repeated or the full thickness of the
8 floor may be removed. The solid residues or rubble produced by treatment or removal will be disposed of
9 as dangerous/mixed waste, unless sampling and analyses are performed to support a request for an
10 Ecology determination that the rubble is not dangerous/mixed waste.

11 The presence of through-thickness cracks or other loss of integrity, if found in concrete floors that rest
12 directly on soil, in secondary containment areas where dangerous/mixed waste releases are documented or
13 suspected, may require a soil contamination investigation. Examples of adequate evidence that a release
14 may have occurred include discoloration or staining of the concrete, odor, or elevated radiation readings
15 observed during the initial closure inspection. Soil and possibly concrete samples will be obtained by
16 coring in the vicinity of known or suspected mixed waste releases. Soil contaminated at concentrations
17 above the risk-based soil cleanup levels will be removed, and confirmation samples will be taken at the
18 limits of the excavation to confirm adequate removal. If analytical results are less than the Hanford soil
19 background levels but greater than the risk-based soil cleanup concentrations, a request for approval of a
20 clean closure-determination will be submitted to Ecology. The request will be supported with the
21 analytical and other pertinent data for that mixed waste container storage unit.

22 If soil contamination is so extensive that the zone of contamination cannot be practically removed, or if
23 groundwater contamination could result, the Closure Plan will be revised to provide for additional
24 investigation and measures to address corrective action requirements. Decontamination documentation
25 will be prepared as described in Sections 11.3.4 and 11.4.1.

26 **11.6.3 Closure of Containment Building Units**

27 One containment building unit, the pretreatment plant hot cell maintenance area containment building
28 unit, will be used for secondary waste (mostly debris) decontamination, size reduction, and packaging
29 operations throughout the operating life of the WTP. It may be used for these same functions during the
30 closure period. The HLW melter (cave) containment building may be used for similar operations during
31 closure, after the normal melter operations have been completed. In particular, the HLW melter
32 containment building may be used to partially decontaminate and overpack failed HLW melters that were
33 stored in the failed melter storage building (container storage area) during the operating life of the plant.

34 After completion of operations to facilitate closure of other permitted DWMUs, the melters and
35 associated spent parts, feed apparatus, and off-gas control equipment will be removed. The containment
36 buildings will be closed in the same manner, following the same inspection, decontamination, and
37 documentation requirements identified in Sections 11.6.1 and 11.6.2 for tank system secondary
38 containment areas and mixed waste container storage units. Several significant differences in design and
39 mixed waste types may result in substantially longer time requirements for closure of the permitted
40 containment building units, as compared to mixed waste container storage units. For example, most
41 operations in the HLW melter cave will be conducted with remotely operated equipment until the final
42 decontamination stages are reached. Complex remote operations are necessarily slow, and the full extent
43 of necessary decontamination, size reduction, and packaging work will not be known until the final stages
44 of closure. The ILAW containment building units are also larger and contain more equipment than most
45 of the mixed waste container storage units.

1 Other containment building units are more similar to mixed waste container storage units, including
2 coated concrete rather than cladded floors and walls. These containment buildings will be closed in the
3 same manner as the mixed waste container storage units (Section 11.6.2), with the added complications of
4 various types of waste handling equipment such as power manipulators, cranes, and the LAW LSMs.

5 **11.6.4 Closure of Miscellaneous Units**

6 The HLW and LAW melter are miscellaneous units. Several times during the life of the WTP, spent
7 melter will be removed from the HLW melter cave and LAW LSM gallery containment buildings.
8 Removal and replacement of spent melter is not considered closure. One or more of the LAW melter
9 may actually be removed and not replaced before the start of the closure period. The HLW melter is
10 planned to be operating during the deactivation period (the first part of the closure period). If necessary,
11 the HLW melter may be removed and replaced during the closure period to provide treatment for the
12 residues from tank system flushing operations. Such removal and replacement would not be considered
13 closure, although it may occur during the closure period.

14 LAW melter operating equipment openings will be closed and the exterior surfaces decontaminated. The
15 melter will be removed from the LAW melter gallery as intact assemblies, encapsulated, if required, and
16 shipped to the LLBG or another permitted treatment/disposal unit. Failed HLW melter may be stored
17 during the closure period, while treatment, transport, and disposal operations are arranged. HLW melter
18 may be partially decontaminated and packaged in an overpack in the HLW melter cave during the final
19 phases of closure activities. HLW melter in the failed melter storage building (container storage area)
20 may be returned to the HLW melter cave for partial decontamination and packaging. Both types of
21 melter will be treated in accordance with the immobilization treatment standard and disposed of at
22 permitted mixed waste disposal facilities.

23 Removal of melter components will be accomplished according to standard procedures for the operational
24 period of the plant. Special HLW melter closure activities, such as size reduction, decontamination of
25 components, or packaging of components and decontamination residues, may require the development of
26 new procedures or the installation of new equipment.

27 Other miscellaneous units such as off-gas scrubbers, condensers, precipitators, reboilers, oxidizers, and
28 adsorbers will be closed in the same manner, following the same inspection, decontamination, and
29 documentation requirements identified in Sections 11.6.1 and 11.6.2 for tank systems and container
30 storage areas.

31 **11.7 Schedule for Closure**

32 For the purposes of this Closure Plan, the design life of the WTP is estimated at 40 years of operations.
33 The estimated three-year schedule for closure is provided in Figure 11-7.

34 As required by WAC 173-303-610(3)(c), WTP will notify Ecology at least 45 days before the date on
35 which the closure period is expected to start. In addition, WAC 173-303-610(3)(c)(ii)(A) requires that the
36 closure period begin no later than 30 days after the date on which each WTP DWMU receives the final
37 volume of dangerous waste or, if there is a reasonable possibility that the DWMU will receive additional
38 dangerous wastes, no later than one year after the date on which the unit received the most recent volume
39 of dangerous waste. Due to the complexity of the WTP operations, the 30-day requirement to start
40 closure activities will likely be unable to be met for every WTP DWMU. Processing of the final batch of
41 waste feed may require approximately nine months after receiving the final waste feed transfer from the
42 DST system unit. Additional evaluation of the schedule will be conducted prior to closure.

1 The date of receipt of the final volume of bulk waste feed in the melters and various other specific
2 individual permitted DWMUs within the WTP will be at the end of the processing of that final batch of
3 waste feed. This date will roughly correspond to the date of the start of deactivation operations. The
4 pretreatment and HLW feed preparation and melter systems may continue to operate for several months
5 after the start of the closure period. These systems will be processing the tank system flush solutions and
6 producing immobilized waste glass containing most of the residual waste constituents left in the tanks at
7 the start of the closure period.

8 The year the WTP permitted DWMUs close will depend on the time required for the initial portion of the
9 tank waste inventory to be processed, the degree of success in this mission, and whether the WTP will be
10 used to continue to process the remaining Hanford tank waste inventory. Other factors that could affect
11 the year of closure include changes in operational requirements, lifetime extension upgrades, a different
12 operating contractor, and other unforeseen factors.

13 This estimated three-year closure schedule is necessarily general and is not meant to be definitive. For
14 example, completion of decontamination of the pretreatment building and residue removal is shown at
15 approximately 21 months after the start of the closure period. However, decontamination of the LAW,
16 EMF and HLW vitrification plant tanks and other permitted DWMUs is expected to require use of
17 pipelines through the Pretreatment Building to transfer decontamination solutions and rinsates to the
18 LERF/ETF. Therefore, the final decontamination of piping and collection tanks in the Pretreatment
19 Building may not be completed until after the LAW, EMF and HLW vitrification plant tanks and other
20 permitted DWMUs are decontaminated.

21 A more specific schedule will be provided in the revision of this Closure Plan prior to the start of closure
22 activities for each DWMU; in accordance with WAC 173-303-610(3)(b). The revised schedule will take
23 advantage of final design and operating procedure information that is not available at this time. The
24 schedule for closure will include a breakdown of activities to be performed after the date of completion of
25 vitrification processing of the last batch of waste feed from the DST system.

26 **11.8 Extension for Closure Time**

27 The following discussion addresses the extension of the dangerous/mixed waste removal and closure time
28 periods as specified in WAC 173-303-610(4)(a) and (b), respectively. The first citation requires that
29 within 90 days after receiving the final volume of dangerous waste (the DST waste), the owner or
30 operator will treat, remove from the dangerous/mixed waste management unit, or dispose of all dangerous
31 wastes in accordance with the approved Closure Plan. The second requirement is that all closure
32 activities will be completed within 180 days after receiving the final volume of dangerous waste.

33 The need for more than 90 days to remove dangerous/mixed wastes and more than 180 days to complete
34 closure activities is anticipated. This need is due in part to the high radiation fields in many of the mixed
35 waste management units, even after the entire bulk waste inventory has been processed and the residues
36 (the inventory present at the start of the closure period) are removed by flushing. Processing of the final
37 batch of waste feed may require approximately nine months of operation at or near design capacity of the
38 plant, prior to the start of deactivation and closure work. As explained in Section 11.7-~~0~~, these processing
39 operations will be completed, or nearly completed, at the start of the closure period.

40 The large number of mixed waste management units and extensive integrated ancillary equipment such as
41 piping, valves, filters (mostly welded together), and the need to coordinate closure activities with other
42 TSD units both at Hanford and off-site, means that more time will be required for closure than would be
43 necessary for a typical dangerous waste management facility. The decontamination operations described
44 in this Closure Plan are intended to avoid excessive secondary waste generation and to provide for the
45 recycling of some pieces of equipment. The decontamination operations will include extensive use of
46 chemical and physical decontamination treatment technologies. Incineration is not considered as an
47 option for dangerous/mixed wastes to be generated during closure. Solidification, encapsulation, and

1 landfilling of dangerous and mixed wastes will be deliberately minimized. The volumes of wastes that
 2 will be disposed of will also be minimized to the extent practical by physical size reduction. Size
 3 reduction will allow packaging of large tanks, pipe, and support structures in relatively small, densely
 4 packed drums or waste boxes. These waste management priorities are emphasized to support this request
 5 for extension of the waste removal and closure periods, as suggested in Section 8.3 of the Ecology
 6 *Guidance for Clean Closure of Dangerous Waste Units and Facilities* (Ecology 2005).

7 The WTP operator will take the actions necessary to prevent threats to human health and the environment
 8 from the unclosed but not operating WTP, including compliance with applicable permit requirements.
 9 During the first several months of the closure period, a large portion of the plant will be operating to
 10 remove waste residues from the tank systems to the maximum practical extent. Flushing, vitrification,
 11 and other deactivation activities will require continued security and monitoring of the other non-operating
 12 portions of the plant, and no part of the plant will be unsecured or abandoned during the closure period.

13 If necessary, an extension of the three-year closure schedule will be requested and the need for the
 14 extension demonstrated in accordance with WAC 173-303-610(4)(a) and (b). The request would be
 15 determined prior to initiating closure activities, or during closure activities should closure conditions
 16 necessitate. A revised Closure Plan will be submitted for approval if an extension is necessary.

17 Condition II.R.1 Hanford Facility Dangerous Waste Permit (Ecology 2009) requires the Permittees to
 18 notify Ecology in writing, as soon as possible, of deviations or expected deviations from the schedules of
 19 the permit. The Permittees will include with the notification information supporting their claim that they
 20 have used best efforts to meet the required schedules. If Ecology determines that the Permittees have
 21 made best efforts to meet the schedules of the permit, Ecology will notify the Permittees in writing by
 22 certified mail that the Permittees have been granted an extension. Such an extension will not require a
 23 permit modification under Condition I.C.3. Should Ecology determine that the Permittees have not made
 24 best efforts to meet the schedules of the permit, Ecology may take such action as is deemed necessary.
 25 Copies of correspondence regarding schedule extensions will be kept in the Operating Record.

26 Condition II.R.1 Hanford Facility Dangerous Waste Permit (Ecology 2009) provides that any schedule
 27 extension granted through the approved change control process identified in the *Hanford Federal Facility*
 28 *Agreement and Consent Order* (Ecology, EPA, and DOE 1998) will be incorporated into the permit.
 29 Such a revision will not require a permit modification under Condition I.C.3.

30

Table 11-1 Maximum Waste Inventory

Mixed Waste Management Unit	Maximum Inventory ^a
Total container storage	1,089,000 gal
Total tank storage	5,717,000 gal

^aMiscellaneous (e.g., melter and off-gas equipment) and containment building units are not counted, as they will be processing the volumes previously stored in tanks, and producing treated and secondary wastes that are included in the container storage total.

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Table 11-2 Clean Closure Performance Standards and Activities^a

Mixed Waste Management Unit Type	Components	Performance Standards	Closure Activities
Tank system	Exterior surfaces Interior surfaces Ancillary equipment Secondary containment	Clean debris surface, risk-based limits, or removal	Extraction technologies or removal of tanks Liner and concrete decontamination and/or removal
Container storage area	Floor, walls, and ancillary equipment	Clean debris surface, risk-based limits, or removal	Extraction technologies Liner and concrete decontamination and/or removal
Containment building	Floor, walls, and ancillary equipment	Clean debris surface, risk-based limits, or removal	Extraction technologies Liner and concrete decontamination and/or removal
Miscellaneous units (melter)	Melters and ancillary equipment	Removal	Removal
Miscellaneous units (others)	Exterior surfaces Interior surfaces Ancillary equipment Secondary containment, as applicable	Clean debris surface, risk-based limits, or removal	Extraction technologies or removal of miscellaneous units Liner and concrete decontamination and/or removal

^aRefers to WAC 173-303-610 and 40 CFR 268.45, Table 1, as incorporated by reference at WAC 173-303-140 (2)(a).

2

DECONTAMINATION CHECKLIST

This checklist is intended to document decontamination work and the attainment of a clean debris surface for the following components, structures, and materials.

- 1 Building or location:
- 2 Component or Area:
- 3 Material (such as concrete, metal):
- 4 Decontamination treatment method¹:
- 5 Decontamination treatment parameters:
 - Temperature
 - Propellant
 - Solid media (such as shot, grit, beads)
 - Pressure
 - Residence time
 - Surfactants
 - Detergents
 - Grinding or striking media (such as wheels, piston heads)
 - Depth of surface layer removal in cm (in concrete, for example)
 - Other

The decontamination of the building, component, or material identified in steps 1 through 3 was completed as specified at steps 4 and 5.

_____ / _____
Title Signature Date

6 Performance Standard:

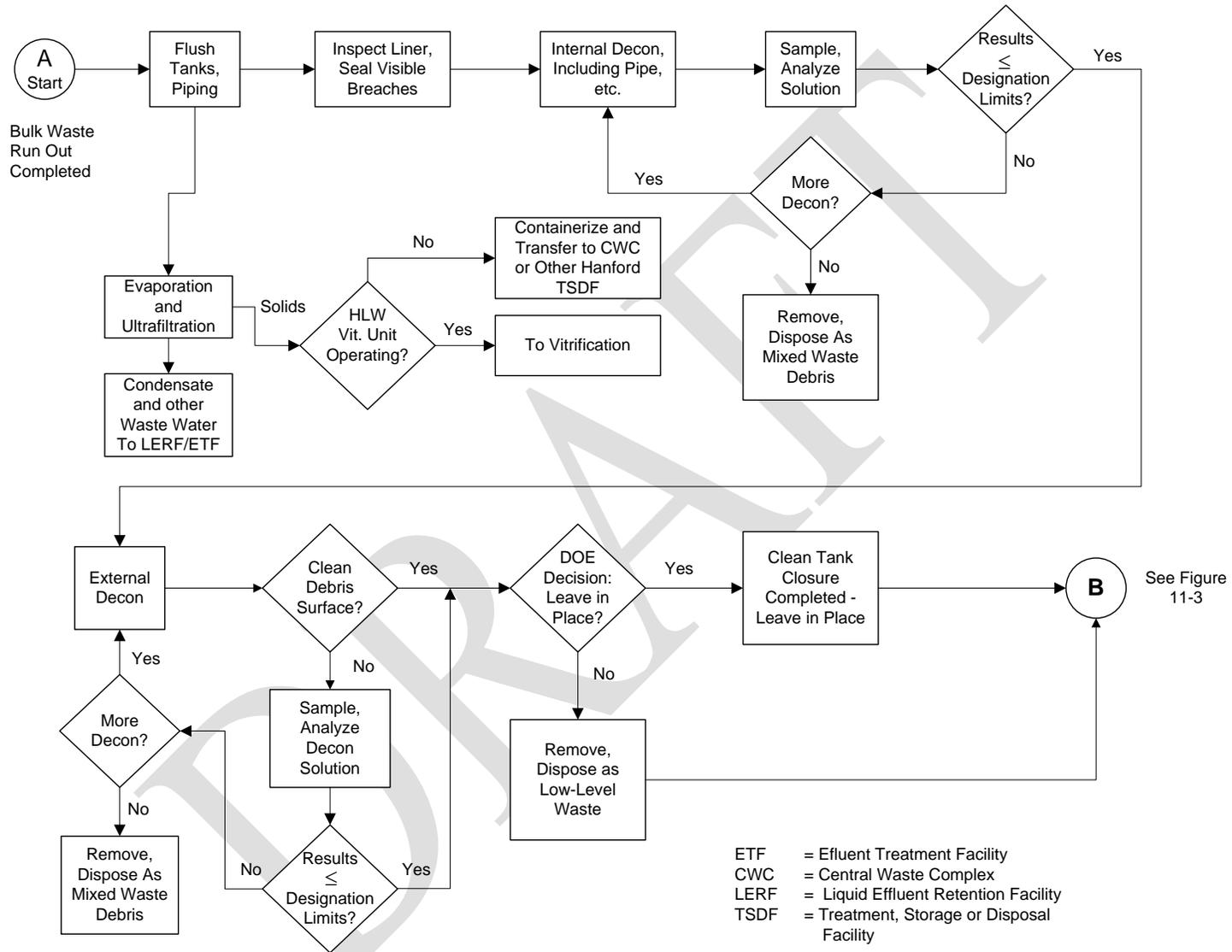
I have visually inspected the above-identified material before / after (circle one) decontamination or treatment in accordance with the closure plan. Dangerous waste residues have / have not (circle one) been removed to attain a clean debris surface².

_____ / _____
Authorized Representative Signature Date

Notes:

- 1 Decontamination treatment will use a chemical or physical extraction method as listed in Table 1, Alternative Treatment Standards for Hazardous Debris (40 CFR 268.45).
- 2 Clean debris surface as defined in Table 1, Alternative Treatment Standards for Hazardous Debris (40 CFR 268.45): "Clean debris surface' means the surface, when viewed without magnification, will be free of all visible contaminated soil and hazardous waste except that residual staining from soil and waste consisting of light shadows, slight streaks, or minor discolorations, and soil and waste in cracks, crevices, and pits may be present provided that such staining and waste and soil in cracks, crevices, and pits will be limited to no more than 5 % of each square inch of surface area."

Figure 11-1 Sample Clean Debris Surface Checklist



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Figure 11-2 Closure Strategy Flowchart for Tank Systems

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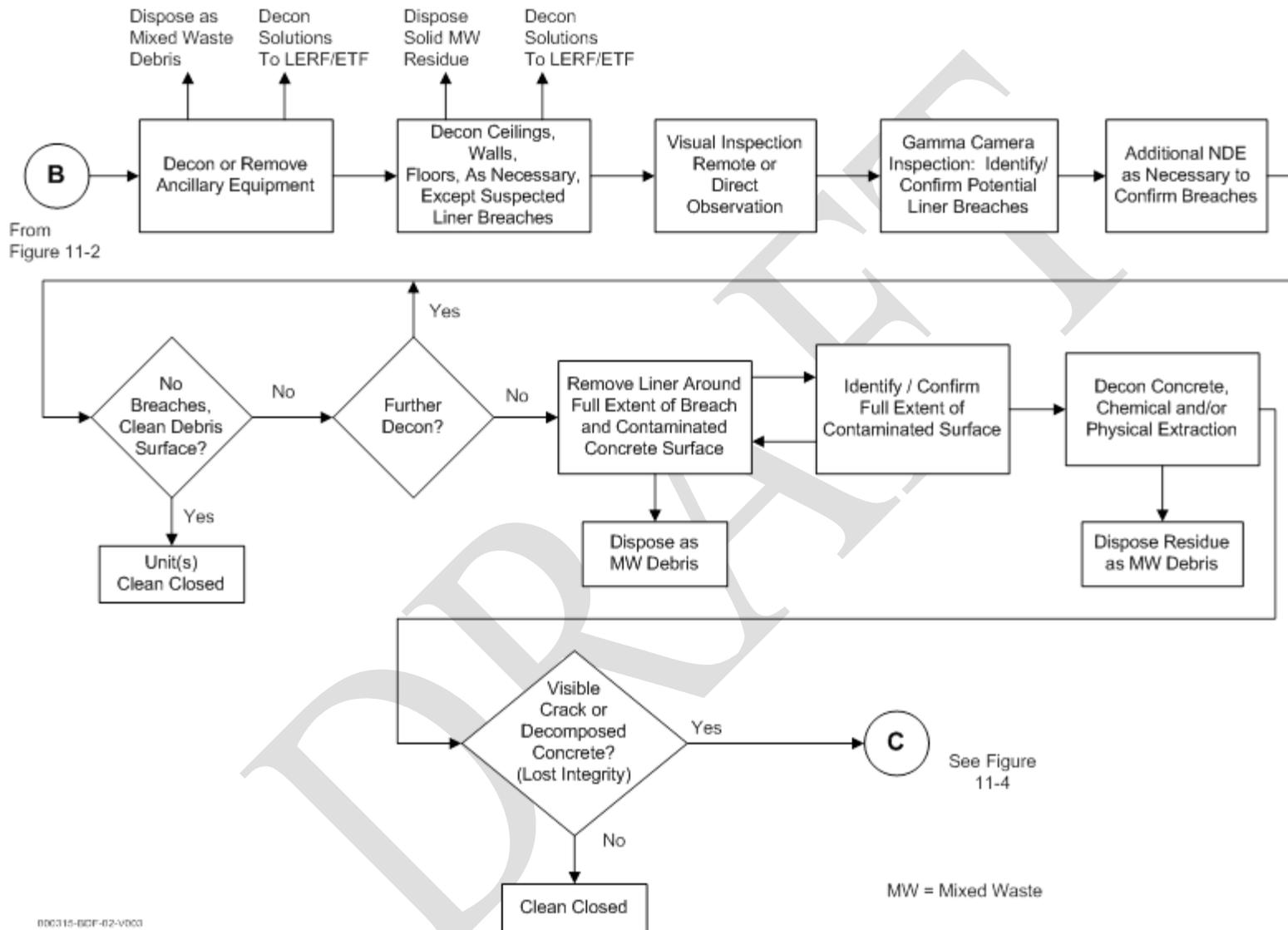
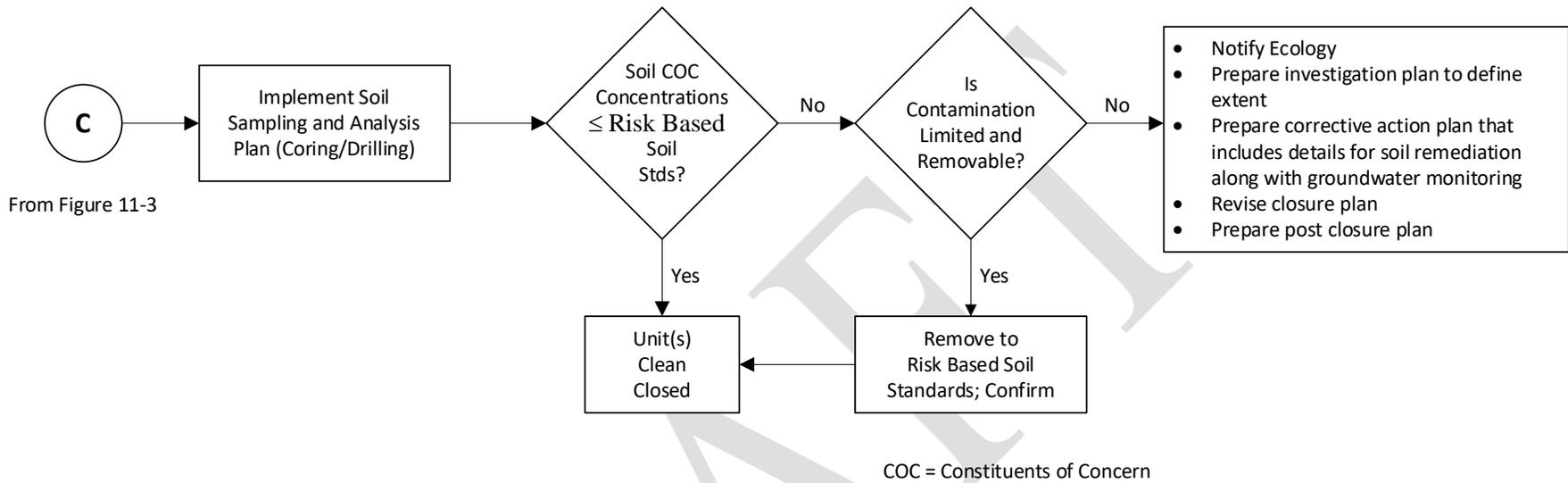


Figure 11-3 Closure Strategy for Container Storage, Containment Building, Miscellaneous Unit, and Tank System Secondary Containment Areas

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Figure 11-4 Closure Strategy Flowchart for Soils and Groundwater

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RCRA CLOSURE CERTIFICATION
FOR

River Protection Project – Waste Treatment Plant
Hanford Site
US Department of Energy, Richland Operations Office

We, the undersigned, hereby certify that _____ closure activities were performed in accordance with the specifications in the approved closure plan.

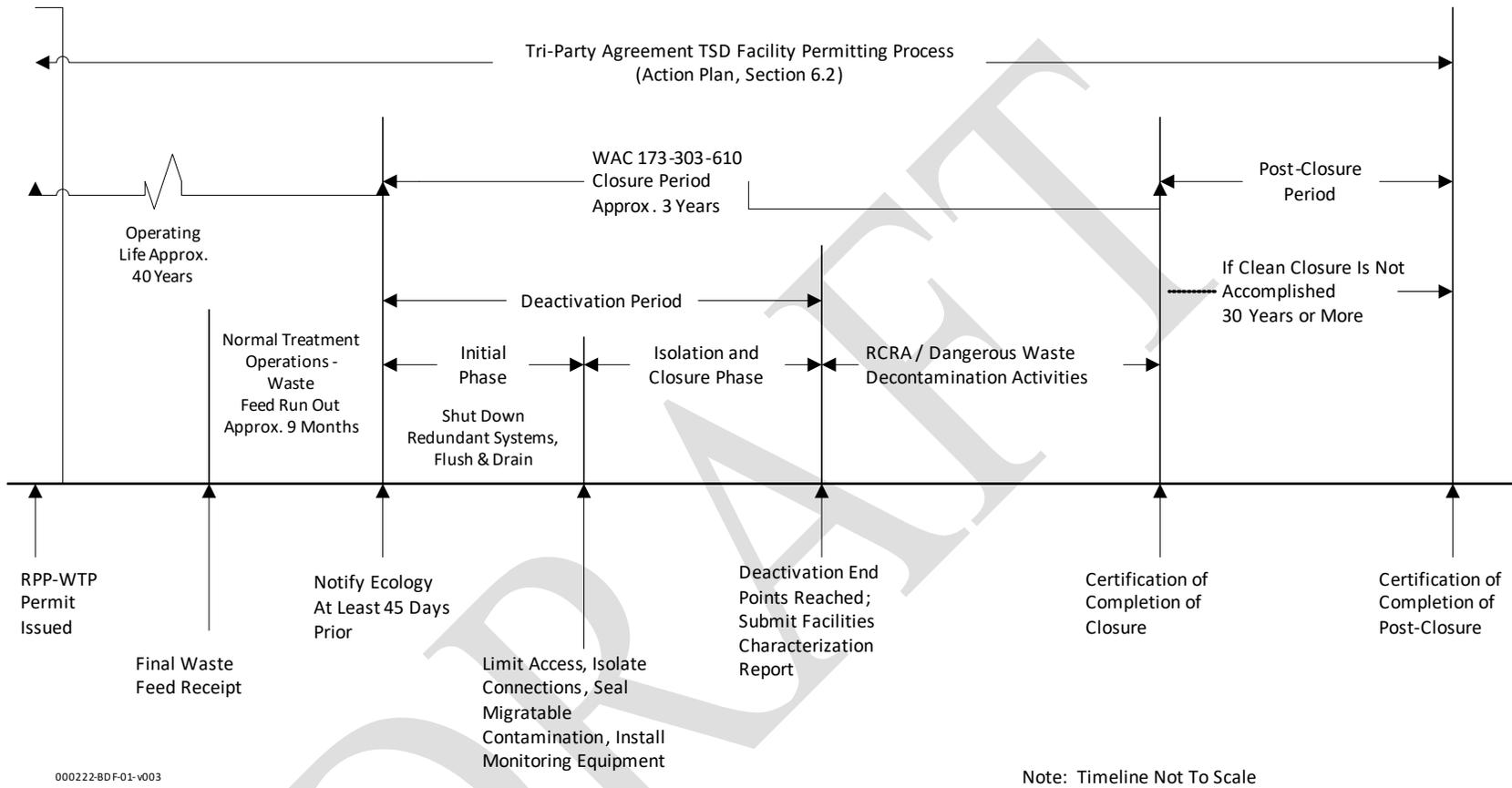
Owner/Operator	Signature	/ Date
Contractor Representative	Signature	/ Date
Independent Registered Professional Engineer	Signature	/ Date
Washington State PE # _____		

Figure 11-5 Example Closure Certification Statement

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Figure 11-6 Waste Treatment Plant Permitting, Deactivation, and Closure

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WASTE TREATMENT AND IMMOBILIZATION PLANT
APPENDIX 1.3
WTP INTERIM COMPLIANCE SCHEDULE
WTP LOW-ACTIVITY WASTE FACILITY
CHANGE CONTROL LOG

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The “**Modification Number**” represents Ecology’s method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table

Modification Date	Modification Number
06/24/2020	8C.2020.3F
08/30/2018	8C.2018.3F
11/28/2017	8C.2017.8F

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**APPENDIX 1.3
WTP INTERIM COMPLIANCE SCHEDULE
WTP LOW-ACTIVITY WASTE FACILITY**

Low-Activity Waste Interim Compliance Schedule

	Compliance Schedule Submittal	Interim Compliance Date¹
	III.10.C.2	
LAW-1	Submit documentation stating the Waste Treatment and Immobilization Plant (WTP) Low-Activity Waste (LAW) Facility has been constructed in compliance with the Permit. Submit additional documentation not available for any additional proposed permit conditions, at the time of permit issuance to Ecology. Ecology will make a determination if additional permit conditions should be added.	12/31/2020
	III.10.C.3	
LAW-3	Update and submit Waste Analysis Plan and associated Quality Assurance Project Plan (Chapter 3A and 3B) to Ecology for review and approval.	Complete
	III.10.C.5	
LAW-4	Update and submit Procedures to Prevent Hazards and Inspection Schedule (Chapter 6 and Chapter 6A) to Ecology for review and approval.	Complete
	III.10.C.6	
LAW-5	Update and submit the Contingency Plan (Chapter 7) to Ecology for review and approval.	Complete
	III.10.C.7	
LAW-6	Update and submit Training Program (Chapter 8) to Ecology for review and approval.	Complete
LAW-7	Submit under separate cover the actual WTP Dangerous Waste Training Plan for incorporation into Administrative Record.	Complete
	III.10.C.8	
LAW-8	Update and resubmit the Closure Plan (Chapter 11) to Ecology for review and approval.	6/30/2020 Complete
	Containers III.10.D.10	
LAW-11	Update and submit descriptions of container management practices (Chapter 4E) to Ecology for review and approval.	Complete

Low-Activity Waste Interim Compliance Schedule

	Compliance Schedule Submittal	Interim Compliance Date¹
LAW-46	Submit the updated BOF-001 permit package associated with the Failed Melter Storage Building (Building 32).	Complete
Tank Systems III.10.E.9		
LAW-13	Update and submit engineering information for each dangerous waste tank and primary sump (Chapter 4E) to Ecology for review and approval.	Complete
LAW-14	Update and submit engineering information for each tank system ancillary equipment (Chapter 4E) to Ecology for review and approval.	Complete
LAW-15	Update and submit descriptions of tank management practices (Chapter 4E) to Ecology for review and approval.	Complete
Containment Buildings III.10.F.7		
LAW-17	Update and submit descriptions of containment building management practices (Chapter 4E) to Ecology for review and approval.	Complete
LAW Short Term Melter Unit III.10.11.5		
LAW-25	Submit descriptions of management practices for the LAW Vitrification Miscellaneous Treatment System (Chapter 4E) to Ecology for review and approval.	Complete
LAW-26	Submit LAW Vitrification Environmental Performance Demonstration Test Plan for Ecology review and approval.	Complete
Report of Progress		
LAW-45	Update and submit Process Information (Chapter 4) to Ecology for review and approval.	Complete
Final Compliance Date		
LAW-32	Final Compliance Date (Hot Commissioning Complete).	12/31/2023

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¹The LAW compliance dates for construction completion (LAW-1) and final compliance (LAW-32) have been revised to reflect dates established in the Amended Consent Decree, *State of Washington v. Dept. of Energy*, Case 2:08-CV-08-5085-RMP (E.D. WA March 11, 2016)

**WASTE TREATMENT AND IMMOBILIZATION PLANT
APPENDIX 1.4
INTERIM COMPLIANCE SCHEDULE
WTP EFFLUENT MANAGEMENT FACILITY
CHANGE CONTROL LOG**

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The “**Modification Number**” represents Ecology’s method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table

Modification Date	Modification Number
08/05/2020	8C.2020.4F
06/24/2020	8C.2020.3F
06/12/2019	24590-WTP-PCN-ENV-19-002 (8C.2019.Q2)
08/23/2018	8C.2018.4F
09/05/2017	8C.2017.6F

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**APPENDIX 1.4
INTERIM COMPLIANCE SCHEDULE
WTP EFFLUENT MANAGEMENT FACILITY**

	Effluent Management Facility (EMF) Compliance Schedule Submittal	Interim Compliance Date
	III.10.C.2	
EMF-1	Submit documentation stating the EMF has been constructed in compliance with the Permit.	12/31/2020
	III.10.C.3	
EMF-3	Update and submit for approval Waste Analysis Plan and associated Quality Assurance Project Plan (Chapter 3A and 3B) to Ecology for review and approval.	Complete
	III.10.C.5	
EMF-4	Update and submit for approval Procedures to Prevent Hazards and Inspection Schedule (Chapter 6 and Appendix 6A) to Ecology for review and approval.	Complete
	III.10.C.6	
EMF-5	Update and submit the Contingency Plan (Chapter 7) to Ecology for review and approval.	Complete
	III.10.C.7	
EMF-6	Update and submit Training Program (Chapter 8) to Ecology for review and approval.	Complete
EMF-7	Submit under separate cover the actual Waste Treatment and Immobilization Plant (WTP) Dangerous Waste Training Plan for incorporation into Administrative Record.	Complete
	III.10.C.8	
EMF-8	Update and submit the Closure Plan (Chapter 11) to Ecology for review and approval.	6/30/2020 Complete
	III.10.C.11	
EMF-9	Update and submit Risk Assessment Work Plan, revised in consultation with Ecology to address the Direct-Feed Low-Activity Waste configuration.	Complete
	Containers III.10.D.10	
EMF-11	Update and submit descriptions of container management practices (Appendix 4G) to Ecology for review and approval.	Complete

	Effluent Management Facility (EMF) Compliance Schedule Submittal	Interim Compliance Date
	Prior to Installation III.10.E.9	
EMF-13	Update and submit engineering information for each dangerous waste tank (Appendix 4G) to Ecology for review and approval.	Complete
EMF-14	Update and submit engineering information for each tank system ancillary equipment (Appendix 4G) to Ecology for review and approval.	Complete
	Report of Progress	
EMF-45	Update and submit descriptions of tank management practices (Appendix 4G) to Ecology for review and approval.	Complete
	EMF Misc. Units Systems III.10.M.A	
EMF-16	Submit engineering information for EMF Miscellaneous Treatment Unit Systems.	Complete
	Final Compliance Date	
EMF-32	Final Compliance Date (Hot Commissioning Complete).	12/31/2023