



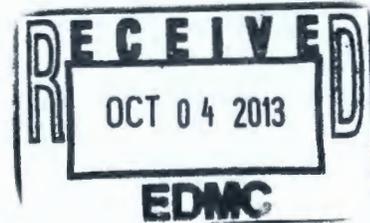
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Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

13-AMRP-0311

SEP 26 2013

Ms. J. A. Hedges, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton  
Richland, Washington 99354



Dear Ms. Hedges:

**221-T RAILROAD TUNNEL AND WASTE RECEIVING AND PACKAGING FACILITY  
DANGEROUS WASTE MANAGEMENT UNITS START OF CLOSURE EXTENSION  
REQUEST**

On July 1, 2013, the U.S. Department of Energy Richland Operations Office (RL) and the U.S. Environmental Protection Agency (EPA) executed a Consent Agreement and Final Order (CAFO) (Docket No: RCRA-10-2013-0113) requiring initiation of closure of several Hanford Site Hazardous also known as Dangerous Waste Management Units (DWMUs). At Section 4.4 of the CAFO, it states:

- d. Within 120 days of the effective date of the Final Order, Respondent shall submit a written closure plan to the State of Washington Department of Ecology (Ecology) for the 221T Railroad Tunnel Treatment, Storage, and Disposal (TSD) unit at T Plant and Building 2401W TSD unit at Central Waste Complex (CWC) that satisfies the closure plan requirements at 40 C.F.R. § 265.112, unless prior to the date that the closure plan is due, Ecology approves an extension pursuant to 40 C.F.R. § 265.112(d)(2), as incorporated and modified by Washington Administrative Code 173-303-400, upon a demonstration (emphasis added) that the dangerous waste management unit has the capacity to receive additional dangerous wastes and that Respondent will continue to take all steps to prevent threats to human health and the environment, including compliance with all applicable requirements. Respondent also must submit a copy of the closure plan and all subsequent revisions to EPA.

The language of this provision paraphrases the language of the cited regulation, 40 CFR 265.112(d)(2)(i), which states:

that the date when he “expects to begin closure” must be either: within 30 days after the date on which any hazardous waste management unit receives the known final volume of hazardous wastes, or, if there is a reasonable possibility that the hazardous waste management unit will receive additional hazardous wastes, no later than one year after the date on which the unit received the most recent volume of hazardous waste. If the owner or operator of a hazardous waste management unit can demonstrate to the Regional Administrator that the hazardous waste management unit or facility has the capacity

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SEP 26 2013

to receive additional hazardous wastes and he has taken, and will continue to take, all steps to prevent threats to human health and the environment, including compliance with all interim status requirements, the Regional Administrator may approve an extension to this one-year limit.

In order to ensure compliance with 40 CFR 265.112(d)(2)(i), RL has determined that the Solid Waste Operations Complex DWMUs listed below are affected by this requirement and still have the capacity to receive additional dangerous and/or mixed waste. These DWMUs are needed to support future Hanford Site waste management activities. RL is requesting that the date to begin final Resource Conservation and Recovery Act (RCRA) closure of the following dangerous waste management units be extended until such time that the final receipt of waste has occurred. A determination has been made that there is no further dangerous waste management activities needed at the 2401-W Building and a RCRA closure plan will be submitted by the required due date in a separate transmittal as required by the CAFO.

**Dangerous Waste Management Units Needing a Delay in the Start of Closure**

Operating Unit Group (OUG)	Dangerous Waste Management Units
T Plant	221-T Railroad Tunnel
CWC- Waste Receiving and Packaging Facility (WRAP)	2336W Building - Shipping and Receiving Area 2336-W Building NDE/NDA Area 2336-W Building Process Area 2336-W Building Room 152 2404-WB Building 2404-WC Building

Further description of future needs, capacity, and the measures to prevent threats to human health and the environment are attached.

We would appreciate your approval of this extension request by October 4, 2013, to support the schedule specified in the EPA CAFO. If you have any questions, please contact me, or your staff may contact Jonathan Dowell, Assistant Manager for the River and Plateau, on (509) 373-9971.

Sincerely,



Matt McCormick  
Manager

AMRP:MSC

Attachment

cc: See Page 3

SEP 26 2013

cc w/attach:

D. B. Bartus, EPA  
L. T. Blackford, CHPRC  
G. Bohnee, NPT  
R. Buck, Wanapum  
A. E. Cawrse, CHPRC  
S. L. Dahl-Crumpler, Ecology  
L. M. Dittmer, CHPRC  
B. J. Dixon, CHPRC  
R. H. Engelmann, CHPRC  
D. A. Faulk, EPA  
S. Harris, CTUIR  
M. N. Jaraysi, CHPRC  
R. Jim, YN  
S. Hudson, HAB  
R. A. Kaldor, MSA  
S. S. Lowe, Ecology  
N. M. Menard, Ecology  
K. Niles, ODOE  
T. W. Noland, MSA  
R. E. Piippo, MSA  
J. B. Price, Ecology  
A. L. Prignano, Ecology  
D. Rowland, YN  
F. A. Ruck III, CHPRC  
D. G. Singleton, Ecology  
Administrative Record (TSD: T-2-7, TS-2-4)  
Ecology NWP Library  
Environmental Portal  
HF Operating Record (J. K. Perry, MSA, H7-28)

## ATTACHMENT

### **221-T Railroad Tunnel Dangerous Waste Management Unit**

**Anticipated Receipt of Additional Dangerous or Mixed Waste:** Present plans are for the 221-T Railroad Tunnel to be used in the future for dangerous waste and mixed waste management activities in support of Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Action Plan Milestone M-091 and other Hanford Site cleanup actions including 105-K Fuel Storage Basins sludge treatment. These waste management activities are dynamic in nature and schedules are driven by federal budget allocations. Waste management campaigns include venting and repackaging of transuranic mixed waste stored in drums to meet offsite disposal requirements, such as at the Waste Isolation Pilot Plant. Wastes to be managed include low-level waste, mixed low-level waste, transuranic waste, mixed transuranic waste, dangerous waste and Toxic Substance Control Act polychlorinated biphenyl waste. Closure of this unit would be incompatible with the necessary continued operation of the T Plant Operating Unit Group (OUG).

**Capacity to Receive Additional Waste:** As described in the current Resource Conservation and Recovery Act (RCRA) Part A Form for the T Plant OUG the 221-T Railroad Tunnel Dangerous Waste Management Unit (DWMU) is permitted for container storage and treatment with the maximum waste storage capacity of 224,640 liters. Currently, no dangerous or mixed waste is being stored in the tunnel. As demonstrate by previous dangerous, mixed, or mixed transuranic waste management storage and treatment at this DWMU, the capacity is sufficient for management of additional dangerous or mixed waste that is generated from processes at the Hanford site and may be stored and treated at this DWMU as part of the T Plant OUG.

**Steps to Prevent Threats to Human Health and the Environment:** For the 221-T Railroad Tunnel DWMU, the U.S. Department of Energy Richland Operations Office (RL) has taken, and will continue to take steps to prevent threats to human health and the environment, including compliance with all applicable interim status requirements. The construction of the tunnel allows for the storage and treatment operations to meet RCRA interim status standards. These RCRA compliance requirements include dangerous waste management unit inspections, personnel training, and emergency preparedness.

### **Central Waste Complex- Waste Receiving and Packaging Facility (CWC-WRAP) OUG Dangerous Waste Management Units**

**Anticipated Receipt of Additional Dangerous or Mixed Waste:** As describe in the current RCRA Part A Permit for this unit, the CWC-WRAP dangerous management units included in this request are expected to be needed in the future for dangerous and mixed waste activities in support of Tri-Party Agreement Action Plan Milestone M-091 and other Hanford Site cleanup actions including retrieval activities at the 618-10 and 618-11 Burial Grounds. These waste management activities are dynamic in nature and schedules are driven by federal budget allocations. Future campaigns for these DWMUs will include storage and treatment of mixed low level waste (MLLW) and transuranic mixed waste (TRUM). Closure of this unit would be incompatible with the necessary continued operation of the CWC-WRAP OUG.

Capacity to Receive Additional Waste: The WRAP portion of the CWC-WRAP OUG is permitted under interim status and has process and design capacity for container storage and treatment. The storage design capacity for the DWMUs listed below is 3,430,300 liters (906,288 gallons) and the treatment design capacity is 12,900 liters/day and is broken out below:

**Treatment and Storage Capacity for WRAP Dangerous Waste Management Units**

<b>DWMU</b>	<b>Treatment Capacity (Liters/Day)</b>	<b>Storage Capacity (Liters)</b>
2336-W Building - Shipping and Receiving Area		
2336-W Building NDE/NDA Area		
2336-W Building Process Area		
2336-W Building Room 152		
2404-WB Building		
2404-WC Building		
<b>Totals</b>	<b>12,900 L/Day</b>	<b>3,430,300 L</b>

Note: Volumes are from WA7890008967, Part III, Operating Unit 7, Waste Receiving and Processing Facility, Revision 6, October 1, 2008.

Currently, there is one partially-filled container of dangerous waste (10-gallon container) stored within the DWMUs of the WRAP portion of the CWC-WRAP OUG. This container is stored in the 2336-W Building, Room 152 and contains dangerous waste generated from maintenance and operations-related activities that have been performed at WRAP. As demonstrate by previous dangerous, mixed, or mixed transuranic waste management storage and treatment at these DWMUs, the capacity is sufficient for management of additional dangerous or mixed waste that is generated from processes at the Hanford Site that will be stored and treated at the DWMUs of the WRAP portion of the CWC-WRAP OUG.

Steps to Prevent Threats to Human Health and the Environment: For the WRAP DWMUs described above, RL has taken, and will continue to take, steps to prevent threats to human health and the environment, including compliance with all interim status requirements. The WRAP DWMUs have been designed and constructed to meet standards to minimize any threats to human health and the environment. These RCRA compliance requirements include dangerous waste management unit inspections, personnel training, and emergency preparedness.