



Tri-Party Agreement



## Letter to the Public

Over the last few months, the Department of Energy, the Environmental Protection Agency, and the State of Washington have been negotiating intensely over major issues in the Hanford cleanup. Last February, DOE proposed to EPA and the State a series of delays in several key milestones of the Tri-Party Agreement (TPA). After reviewing the justification provided by DOE, the regulators denied those proposed changes in April.

EPA and Ecology continued to negotiate with DOE because there are some very real problems in the Hanford cleanup, that warrant some change in the TPA. On May 15, the three parties reached agreement on all the significant issues on which we have been negotiating, and we now have some new proposed changes that we would like to share with you. These proposals are being made jointly by all three parties; they represent the product of hundreds of hours of technical work and negotiation over the last few weeks.

Some of these changes represent significant delays in some of the original milestones in the TPA. EPA and Ecology have agreed to these changes only after being convinced that there are substantial technical reasons why the original milestone cannot be achieved. The new schedules will push these projects through to completion as quickly as possible.

The parties continue to recognize the importance and significance of the tank safety issues. Changes to the single-shell tank milestones reflect a cautious and disciplined approach to dealing with these issues. Stabilization of double-shell tank wastes, which was not specifically addressed in the TPA, is now being expedited as a separate milestone. Public health and safety remain paramount to all parties as efforts are made to reach environmental compliance.

There are also some significant new milestones being added to the Agreement. For the first time, DOE's liquid discharges at Hanford are being placed under the independent regulation of Ecology's water permitting program. EPA's Superfund authority is also being used to regulate these streams. There are significant new restrictions on 12 high priority liquid streams that will substantially reduce the volume of these discharges and their environmental threat.

All the proposed changes are summarized in the materials enclosed and detailed information on each proposal is available for review and comment at the public information repositories. A formal public comment period on these proposed changes will be held from May 22 through July 5. We will also be holding public meetings during that period to discuss these changes. We invite you to attend those meetings and let us know what you think. The dates and locations of the public meetings, as well as the locations of the public information repositories, are shown on the following page.

*Dana A. Rasmussen* 5/20/91  
DANA A. RASMUSSEN Dated  
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Region 10

*John D. Wagoner* 5/17/91  
JOHN D. WAGONER Dated  
Manager, Richland Operations Office  
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*Christine O. Gregoire* 5/20/91  
CHRISTINE O. GREGOIRE Dated  
Director  
Department of Ecology  
State of Washington

Public Information Repositories

University of Washington - Suzzalo Library  
 Mailstop FM-25 - Government Publications  
 Seattle, Washington 98915

U.S. Department of Energy-Richland Operations  
 Public Reading Room  
 Federal Building Room 157  
 825 Jadwin Avenue  
 Richland, Washington 99352

Portland State University Library  
 P.O. Box 1151  
 Corner of Harrison and Park  
 Portland, Oregon 97207

Crosby Library  
 Gonzaga University  
 E. 502 Boone  
 Spokane, Washington 99258

Public Meetings -- Dates and Locations

<u>Date</u>	<u>Location</u>
Monday, June 17	Shilo Rivershore Inn 50 Comstock Richland, Washington (Room: International I)
Tuesday, June 18	Ridpath/Westcoast Hotel W. 515 Sprague Spokane, Washington (Room: Terrace, B & C)
Wednesday, June 19	Holiday Inn-Crowne Plaza 6th and Seneca Seattle, Washington (Room: Ballroom)
Thursday, June 20	Red Lion Inn at the Quay 100 Columbia Street Vancouver, Washington (Room: River Rooms)

Note: At all locations, informal discussions will begin at 6:30 p.m., and the actual meeting will begin at 7:00 p.m.



PROPOSED CHANGES TO THE HANFORD  
TRI-PARTY AGREEMENT  
MAY 1991

Hanford Site Project Management System Upgrades. DOE has agreed to enhance and modify it's project management system to ensure strict lines of accountability, frequent reporting of program status under Tri-Party Agreement (Agreement) milestones, identification of actions necessary to get any part of the cleanup effort back on schedule, and cost control accounting. Ecology and EPA shall be working with DOE over the next few months to ensure system upgrades are acceptable to all parties.

Funding Language. DOE has agreed to increased involvement by Ecology and EPA in the preparation of Hanford's annual funding estimates and has promised to notify and consult with the two regulatory agencies prior to proposing any budgetary changes which might affect the milestones under the Agreement.

Liquid Effluent Treatment and Disposal. DOE has agreed to include treatment or closure schedules in the Tri-Party Agreement for 33 of the most significant liquid effluent streams which discharge to the soil at Hanford. These schedules will be negotiated by this September. For the first time, DOE is agreeing to the regulation of all streams under the State's waste discharge permit program. The near-term environmental impact of the 12 highest priority discharges will be significantly reduced by operating restrictions enforced through the Tri-Party Agreement. These improved practices are already being put into effect. For example, the volume of liquids discharged to the soil at the N-Reactor has been reduced by 99%.

Past Practices. Three major milestones cover DOE's commitments to investigate and clean up the past contamination of Hanford soil and groundwater. A new strategy for carrying out much of this work is being proposed. The new strategy will integrate some parts of the investigations across broader areas of the Hanford site. This includes provisions for conducting a river impact study, establishing sitewide background values for soil and groundwater and developing a risk assessment methodology. It is intended to get these investigations completed more quickly and more efficiently, so that cleanups can begin sooner. The new strategy includes a number of new milestones for DOE, together with a short-term deferral of some investigations previously planned for the next year.

Pretreatment. A new date for initiation of pretreatment operations will be proposed upon completion of a study to evaluate pretreatment options for double shell tank waste. This study will be completed in December 1991. The study is intended to identify pretreatment solutions which are consistent with the 1999 Hanford Waste Vitrification Plant (HWVP) hot start-up. However, the parties recognize that this milestone may need to be revisited if clear and technically valid reasons demonstrate that DOE can not meet a December 1999 date.

HWVP. The HWVP hot start-up date of December 1999 remains unchanged. Initiation of construction is proposed to begin in April 1992 to support the December 1999 date.

Grout. Completion of the first fourteen grout campaigns are proposed to be delayed from September 1994 to December 1996 to accommodate additional safety requirements, to provide time for DOE to resolve grout formulation problems,

and for verification of grout solidification. Three additional enforceable milestones are proposed to be added for the initiation of vault construction.

Single-Shell Tank Interim Stabilization. Changes are proposed to the schedules for interim stabilization of single-shell tanks. The major milestone date of September 1995 is not affected. Additional target dates are proposed to be added to the Tri-Party Agreement schedules for continuation of stabilization activities at individual tank farms in 1991 and 1992.

Single-Shell Tank Waste Characterization. Changes to characterization milestones are proposed due to tank safety issues which continue to be addressed. One milestone is proposed to be redefined to cover the preparation of a sitewide integrated waste sampling plan covering highly radioactive samples. Following completion of the sitewide plan, which is due in March 1992, DOE will propose revised schedules for characterization milestones. No changes to the September 1998 major milestone are proposed. A new enforceable milestone is proposed to be added to restore rotary mode sampling capability for Hanford tank wastes. This proposed milestone has a due date of September 1992.

New Double-Shell Tanks. A change is proposed for construction of additional double-shell tanks. These tanks are necessary in order to provide more flexibility in safely handling wastes for pretreatment prior to disposal.

B Plant Hazardous Waste Permit. The milestone is proposed to be redefined due to the uncertainties regarding B Plant operating status. A new date for submittal of the permit application or closure plan will be established upon completion of the double-shell tank pretreatment study.

Groundwater Monitoring Wells. A 280-day extension, is proposed for the site's ground water monitoring well installation schedule to reflect delays made necessary due to concerns regarding the single-shell tank farm well integrity.

Other Changes. Paragraphs 112 and 114 of the Tri-Party Agreement are proposed to be modified to allow for extensions on a case by case basis, as agreed to by all parties, to the 7-day review period for change packages and initiation of dispute resolution.

In addition to the proposed changes described above, the status of two outstanding change packages is provided below:

WRAP Module I. The 3 parties have agreed to defer a decision on the requested 6 month extension to this milestone until the Architect - Engineer has developed the project schedule.—A decision on this will be made by June 15, 1991.

300 Area Process Trenches. The 3 parties have agreed to allow DOE additional time to provide information to support an extension of the December 1991 date to cease liquid discharges to these trenches. EPA and Ecology have specified that such information must include an analysis of the environmental impact of continued discharges past December 1991. In addition, DOE has agreed to conduct a value engineering study on the treatment system in an effort to accelerate construction. DOE plans to have the additional information available in September of this year.