

# Focus

## Proposed modifications to Hanford's hazardous waste permit

### Background

A facility-wide Hazardous Waste Permit was issued in August 1994 for the Hanford Site by the U.S. Environmental Protection Agency and the Washington State Department of Ecology. The permit was granted under the provisions of the federal Resource Conservation and Recovery Act (RCRA) and the Washington State Dangerous Waste Regulations. The permit outlines general conditions for the operation and closure of dangerous and hazardous waste treatment, storage, and disposal units at Hanford.

Approximately 50 treatment, storage, and disposal (TSD) units at Hanford operate under RCRA interim status. The addition of these units into the Permit will transition them from interim status to final status. After incorporation into the Permit, general conditions apply. In addition, individual units will be subject to conditions based on their status as operating, clean-closed, or post-closure units.

### The Modification Process

The Washington State Dangerous Waste Regulations state: "When a permit is modified, only the conditions subject to modification are re-opened." The proposed modifications have been initiated by Ecology in accordance with the Washington Dangerous Waste Regulations. The U.S. Department of Energy-Richland Operations Office, Westinghouse Hanford Company, Pacific Northwest National Laboratories, and Bechtel Hanford, Incorporated were notified by Ecology that the proposed changes to the permit were determined to be complete and satisfactory.

### Statement of Basis

Washington State Dangerous Waste Regulations require Ecology to prepare a Statement of Basis when a Facility is not prepared for the proposed permit modification(s). An extensive Fact Sheet was prepared for the Hanford Hazardous Waste Permit in September of 1994, and because the proposed modifications will not affect any of the conditions of the permit, a Statement of Basis was prepared and included in the Fact Sheet for this modification. This document satisfies the purpose of both the Fact Sheet and the Statement of Basis.



## 1996 Modifications to the Facility-Wide Permit

The 1996 modifications to the Hanford Hazardous Waste Permit include incorporation of the General Information Document and a new Part VI specific to units operating under the post-closure requirements. In addition, one new unit will be permitted, three units are clean closed, and one will be operated under post-closure conditions. These changes are described below.

The General Information Document was created to incorporate, within a single document, all requirements common to all units at the Hanford Facility covered by the Permit. Therefore, many of the requirements previously found in the Permit for specific units, or within the Permit's General Conditions, are now found in a single attachment to the Permit.

The Permit has a new Part VI. For the first time since its issuance, a unit has closed in a manner other than "clean closure." Therefore, that unit is subject to continuing "Post-closure Requirements." Part VI is being added to the Permit to identify requirements specific to post-closure units.

◆ The Permit includes one newly permitted unit, the **PUREX Storage Tunnels**. These two tunnels are located in the 200 East Area of Hanford, about 28 miles north of Richland. The tunnels are designed to store rail cars holding discarded equipment that is regulated as either mixed or dangerous waste. Both tunnels are approximately 19 feet wide and 22 feet high. Tunnel 1, completed in 1956, is 350 feet long and supplies storage for eight rail cars. Tunnel 2, completed in 1964, is 1,680 feet long and supplies storage for 40 rail cars. Tunnel 1 is constructed of concrete and timbers. Tunnel 2 is constructed of concrete and steel. Both tunnels are covered with nine feet of earth fill. The tunnels are being permitted a miscellaneous unit for storage of mixed waste.

The next three units are scheduled for clean closure.

◆ The **303-K Storage Facility** is found in the northwest portion of the 300 Area. The 303-K Storage Facility was built in 1943 as a small, single-story cinder block building. Various radioactive and mixed hazardous wastes have been or are currently stored in the building and on nearby concrete, asphalt and gravel pads. Clean closure will include sampling of debris and soils associated with the eventual demolition of the building.

◆ The **3718-F Facility** is located in the southeast portion of the 300 Area. It was designed and constructed in 1968 and consists of a single-story storage building, loading pad, and adjoining concrete pad. A burn shed with fume scrubber, two reaction tanks for cleaning equipment, and a safety shower are located on the concrete pad. The 3718-F Facility treated and stored alkali metal waste from 1968 until 1989.

◆ The **4843 Alkali Metal Storage Facility (4843 AMSF)** is located in the northwest corner of the 400 Area on the Hanford Site. The 4843 AMSF began operation as a waste management unit in 1986. The facility received dangerous and mixed alkali metal waste from the Fast Flux Test Facility (FFTF) and from various other operations on the Hanford Site that used alkali metals, including 437-FFTF, 405-FFTF, 324-300A, 4713D, and 4843. The 4843 AMSF provided a centralized building to store shipments of dangerous and/or mixed

alkali metal waste generated on site. Under the closure strategy, the facility is to be clean closed. Smear and sampling tests proved decontamination to be unnecessary. Since it presents no threat to human health or the environment, this building has a proposed future use for equipment storage.

◆ The 300 Area Process Trenches (300 APT) will be closed under the modified closure process in conjunction with the 300-FF-1 Record of Decision and are to be managed under post-closure requirements. *The 300 Area Process Trenches Modified Closure/Post-closure Plan* went through public review and has been approved by Ecology.

The 300 APT is located within the 300 Area of the Hanford Site. This area contained reactor fuel fabrication facilities and research and development laboratories. The 300 APT was constructed and began operations in 1975 as the 316-5 Process Trenches. Effluent was discharged to the trenches from the 300 Area process sewer system, which has been the sole source of effluent for the 300 APT. The 316-5 Process Trenches gained RCRA interim status as the 300 APT TSD unit on November 11, 1985. The unit has been administratively closed to discharges of dangerous waste since 1985, and permanently removed from service in December 1994.

A modification to the operating conditions of the 616 Non-Radioactive Dangerous Waste Storage Facility, located in the 200 West Area, is also proposed for this modification of the Permit. This change to Chapter 6 of the unit's permit application will allow the operators to conduct daily and weekly inspections only when the unit is storing dangerous waste. There are increasingly frequent periods when the facility contains no regulated waste.

### **How can you get involved?**

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A 45-day public comment period will start **August 21** and conclude **October 4, 1996**. A Public Hearing will be held **Tuesday, September 17**, from 7 to 9 p.m. at Ecology's Kennewick Office, 1315 W. 4th Avenue. All comments received during the comment period will be considered and responded to before final decisions are made on these proposals.



For additional information, call Hanford Cleanup toll-free at 1-800-321-2008.

The Hanford Hazardous Waste Site-Wide Permit and the proposed 1996 modifications are available to be read and copied at these **Hanford Information Repositories**:

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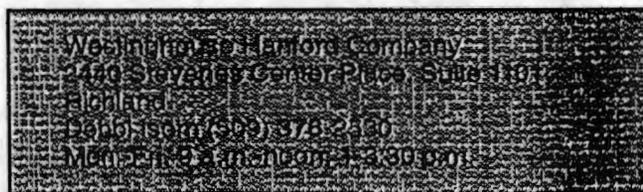
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All information in the repositories, plus the administrative record, including all data submitted by the applicants, may be reviewed at the Hanford administrative record:



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