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Change Number M-20-94-06	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date December 8, 1994
Originator Rhett K. Tranbarger	Phone 372-1258	
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title Waste Management Unit Additions and Boundary Changes to the 200-BP-11 Operable Unit		
Description/Justification of Change Expand the 200-BP-11 Operable Unit boundaries to incorporate the 216-A-29 Ditch and 216-B-63 Trench RCRA (Resource Conservation and Recovery Act) TSD (Treatment, Storage, or Disposal) units, and the 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditch RCRA Past-Practice Units. This change is justified because it allows interrelated waste management units with similar physical characteristics and effluent disposal histories to be effectively investigated under one work/closure plan. Additionally, these changes will consolidate corrective actions within the 200-BP-11 Operable Unit which will effectively save time and budget in the overall cleanup effort at the Hanford Site.		
Impact of Change Expanding the 200-BP-11 Operable Unit boundaries will increase the scope of the field investigation and remedial activities in the operable unit.		
Affected Documents This change will affect the Tri-Party Agreement Appendix B, "Listing of Treatment, Storage, and Disposal Groups/Units;" Appendix C, "Prioritized Listing of Operable Units;" and the TPA Action Plan Work Schedule.		
Approvals		
DOE <i>[Signature]</i>	<i>[Signature]</i> 11-24-95 Date 11-20/95 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
EPA <i>[Signature]</i>	<i>[Signature]</i> 11-24/95 Date 11/24/95 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
Ecology <i>[Signature]</i>	<i>[Signature]</i> 11/24/95 Date 11/24/95 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	

200-BP-11 OPERABLE UNIT BACKGROUND

The 200-BP-11 Operable Unit is located in the north-eastern portion of the 200 East Area of the Hanford Site. The operable unit currently consists of ten waste management units (WMUs), and encompasses approximately 775 acres (1.2 mi²). The 200-BP-11 WMUs are mainly associated with low level waste streams from the 221-B (B Plant) and 202-A (PUREX Plant) Buildings.

Five of the ten WMUs are designated Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and/or Disposal (TSD) Waste Management Units (WMUs) in the Tri-Party Agreement. These units are referred to as the 216-B-3 Main Pond (Main Pond), 216-B-3-3 Ditch, and the 216-B-3A, 216-B-3B, and 216-B-3C Expansion Ponds (Expansion Ponds). The Main Pond and 216-B-3-3 Ditch were decommissioned and backfilled in 1994. The three Expansion Ponds are being closed via the *216-B-3 Expansion Ponds Closure Plan*, DOE/RL-89-28, Rev. 2. The 216-B-3C Expansion Pond is the only active WMU within the operable unit.

The remaining five WMUs are designated RCRA Past-Practice units in the Tri-Party Agreement. They are referred to as the 216-B-3-1 Ditch, 216-B-3-2 Ditch, the 216-E-28 Contingency Pond, and Unplanned Releases UN-200-E-14 and UN-200-E-92. The 216-B-3-1 and 216-B-3-2 Ditches discharged to the Main Pond in the past and have been out of service since 1964 and 1970, respectively. The 216-E-28 Pond encompasses about 30 acres and has never been used. Unplanned release UN-216-E-14 occurred when a dike broke at the 216-B-3 Pond in 1958, and unplanned release UN-216-E-92 surfaced in 1980 as a result of radioactively contaminated Russian Thistle and has since been removed.

In September of 1994, Draft A of the *200-BP-11 Operable Unit and 216-B-3 Main Pond Work/Closure Plan*, DOE/RL-93-74, was completed and submitted to the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) in accordance with Tri-Party Agreement milestone M-13-07.

JUSTIFICATION FOR INCORPORATION OF THE 216-A-29 DITCH, 216-B-63 TRENCH, AND 216-B-2-1, 216-B-2-2, AND 216-B-2-3 DITCHES INTO 200-BP-11

As shown on attached Figure 1, the 216-A-29 Ditch is currently located in the 200-PO-5 Operable Unit and the 216-B-63 Trench and 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditches are located in the 200-BP-8 Operable Unit. The 216-A-29 Ditch and 216-B-63 Trench are RCRA TSD units that are scheduled to have closure plans submitted to Ecology and EPA by May 1996 per TPA milestones M-20-36 and M-20-38, respectively. The 216-A-29 Ditch discharged directly to the Main Pond, 216-B-3-2 Ditch, and 216-B-3-3 Ditch during its operational period. The 216-B-63 Trench did not discharge to other waste management units, however, it did receive similar effluents as those received by the WMUs in the 200-BP-11 Operable Unit. The 216-B-2-1, 216-B-2-2, and

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216-B-2-3 Ditches operated consecutively from 1945 to 1987 by transporting effluent to the 216-B-3-1, 216-B-3-2, and 216-B-3-3 Ditches. Rationale for incorporating these five waste management units into the 200-BP-11 Operable Unit include:

1. The 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditches fed the 216-B-3-1, 216-B-3-2, and 216-B-3-3 Ditches, which in turn discharged to the 216-B-3 Main Pond.
2. The 216-B-63 Trench is directly north of, and parallel to the 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditches. The proximity of the trench to the ditches makes it impractical to investigate these units separately.
3. The effluent received by the 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditches was similar to that of the 216-B-63 Trench.
4. The 216-A-29 Ditch has discharged to the 216-B-3-2 or 216-B-3-3 Ditch throughout its operational period.
5. All five of these WMUs have the same physical structure as the other WMUs in 200-BP-11 (i.e they are all surface impoundments) and can therefore be easily evaluated together.

The attached Figure 2 depicts the new 200-BP-11 Operable Unit boundaries that will result from incorporation of the 216-A-29 Ditch, 216-B-63 Trench, and 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditches.

**TPA CHANGES RESULTING FROM INCORPORATION OF THE 216-A-29 DITCH,
216-B-63 TRENCH, AND 216-B-2-1, -2-2, AND -2-3 DITCHES INTO 200-BP-11**

Appendix B. Revise the 216-A-29 Ditch and 216-B-63 Trench as follows:

Group Number	Group/Units	Operable Unit (if applicable)	Planned Action	
			Closure	Operating Permit
D-2-3	216-A-29 Ditch	200-BP-11	X	
D-2-6	216-B-63 Trench	200-BP-11	X	

Appendix C. Revise the 200-BP-11, 200-PO-5, and 200-BP-8 Operable Units as follows:

200-BP-11 Add the 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditches (Unit Type) as RPP (Unit Category), the 216-B-63 Trench as a TSD (D-2-6), and the 216-A-29 Ditch as a TSD (D-2-3).

(Note also that the title of the "216-E-25" Pond unit should be changed to "216-E-28" and is currently being addressed in the TPA refocus under the C-92-2 Change Control Form)

200-PO-5 Delete the 216-A-29 Ditch. Also, delete the "Unit Category" for UN-200-E-67 (it is not a TSD).

200-BP-8 Delete the 216-B-63 Trench, and the 216-B-2-1, 216-B-2-2, and 216-B-2-3 Ditches.

TPA Action Plan Work Schedule

The TPA Action Plan Work Schedule will reflect that of a work plan, not a closure plan. The proposed Environmental Restoration Refocusing Package M-20-36 milestone will be completed by the submittal of Volume 1, Draft B of the *200-BP-11 Operable Unit RFI/CMS and 216-B-3 Main Pond, 216-B-63 Trench and 216-A-29 Ditch Work/Closure Plan*.

Implementation of work will be conducted in accordance with the regulatory approved schedule provided in the approved version of Volume 1, Rev. 0 of the *200-BP-11 Operable Unit Work/Closure Plan*.

