



Changes Proposed To Hanford's Tri-Party Agreement

Initial Single-Shell Tank Waste Management Area Corrective Actions

Associated Vadose Zone and Groundwater Characterization and Assessment Activities

Integration of Vadose Zone and Groundwater Activities

U.S. Department of Energy • U.S. Environmental Protection Agency • Washington State Department of Ecology

Request For Public Comment

Your review and comment is requested on proposed new Tri-Party Agreement milestones and target dates for groundwater and vadose zone actions for the U.S. Department of Energy's (DOE) single-shell tank waste management areas. The proposed changes will direct single-shell tank waste management area corrective actions (actions taken under Washington's State's Hazardous Waste Management Act (HWMA) and the federal Resource Conservation and Recovery Act (RCRA)). These actions are designed to allow the Tri-Parties to determine the nature and extent of contamination from single-shell tank leaks, to assess risks, to identify actions that need to be taken, and to aid in the cleanup and closure of the tank farms on the Central Plateau in the 200 Area of the Hanford Site.

The DOE, the U.S. Environmental Protection Agency (EPA), and the Washington State Department of Ecology (Ecology) are seeking public comment on the proposed changes from February 16 through April 1, 1999. All public comments will be considered and responded to before final decisions are made. Because these proposed changes to the Tri-Party Agreement are consistent with the existing project schedule and expected funding, public meetings are not currently scheduled. Should substantial public interest indicate a need for meetings, the Tri-Parties will respond accordingly.

If you would like to review proposed modifications, please visit the public information repository nearest you, or review the document at the Tri-Party Agreement homepage: <http://www.hanford.gov>.

To request a copy of proposed modifications, or to submit comments either written or electronically, contact:

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Background

The U.S. Department of Energy's Office of River Protection's mission is to store, treat, and immobilize high-level radioactive waste presently contained in 12 single-shell tank farms and in six double-shell tank farms located on the Central Plateau in the 200 Area of the Hanford Site. The 12 single-shell tank farms are grouped into seven waste management areas for purposes of groundwater assessment and monitoring. These tank farms contain 149 single-shell tanks which are classed as hazardous waste management units regulated under Washington State's HWMA and its implementing requirements. The single-shell tanks are currently operating under interim status pending closure.

Initial Plan

Releases from tank farm areas have caused surface, underlying vadose zone, and groundwater contamination. On July 10, 1998, Ecology directed DOE to develop and submit a corrective action plan covering the eight single-shell tank farms where groundwater contaminants from tank leaks have been documented. In response, DOE invoked the dispute resolution process of the Tri-Party Agreement and asked that the Tri-Parties work together in developing a resolution. Subsequent correspondence between the Tri-Parties elevated this dispute and initiated Tri-Party Agreement negotiations that were held from October 21 to December 11, 1998. The changes proposed here constitute an initial corrective action plan and were developed as a resolution of the dispute.

If you require additional information, call the Hanford Cleanup toll-free line at 1-800-321-2008.

Principal Issues

The Tri-Parties' tentative agreement identifies initial actions necessary for DOE to comply with State and federal corrective action requirements. These initial actions in response to single-shell tank leaks and associated past tank waste discharges will be followed by additional Tri-Party Agreement commitments as new information is acquired. These proposed changes have been coordinated with site-wide groundwater and vadose zone activities under the Groundwater/Vadose Zone Integration Project.

New Strategy

Key elements of the proposed milestone change include:

- The initiation of vadose zone characterization at the single-shell tank farms. Under the proposed modification DOE will initiate single-shell tank farm waste management area vadose zone characterization work beginning in mid-1999. This work will focus on characterization borehole installation at the S-SX tank farm.
- Interim measures identified to date as initial response actions to single-shell tank leaks. These actions include assessment of data collected to date, and initial activities designed to minimize intrusion and contaminant migration to groundwater. The development of corrective action documentation at single-shell tank waste management areas is also designed to enable the Tri-Parties to identify additional interim measures, as well as support single-shell tank waste retrieval and eventual closure of the tank farms.

- Commitments among the Tri-Parties regarding the use of HWMA and RCRA corrective action processes. The Tri-Parties have selected the corrective action process at Section 7.0 of the Tri-Party Agreement for use in developing necessary documentation and to aid in being able to identify necessary actions. Corrective actions will be coordinated over time in order to support retrieval and closure of the single-shell storage tanks under the HWMA and major milestone series M-45-00 of the Tri-Party Agreement. The use of the Tri-Party Agreement's corrective action process provides a framework for groundwater and vadose zone investigations, which will be planned and implemented to support decisions on interim measures, corrective measures, waste retrieval, and eventual closure. This does not affect the applicability of state and federal hazardous waste programs or supersede processes previously established under the Tri-Party Agreement.
- Integration of groundwater and vadose zone activities related to corrective actions at USDOE's single-shell tank waste management areas. Groundwater and vadose zone activities addressed in these milestone changes include activities pertaining to hazardous waste treatment, storage, and disposal units managed by DOE's Office of River Protection. Tank Farm activities will be fully integrated with DOE's Groundwater/Vadose Zone Integration Project.

Ecology and DOE agree that work under the proposed milestone change will be managed under one unified schedule incorporating Tri-Party Agreement milestones, DOE (internal agency) milestones, and DOE contractor milestones. On approval of this change, Hanford Site internal planning, management, and budget documents will be modified accordingly.

Historical Note

The U.S. Department of Energy's Richland Operations Office owns the Hanford Site in southeastern Washington State. Hanford was established during World War II as part of the top secret Manhattan Project to produce plutonium for nuclear weapons. Weapons material production was halted in the late 1980s. The Hanford Site is now engaged in the world's largest cleanup effort to deal with the legacy of radioactive and hazardous wastes that resulted from the plutonium production era. Hanford's cleanup program is regulated by the U.S. Environmental Protection Agency and the Washington Department of Ecology under a long term compliance contract called the Tri-Party Agreement. This agreement sets the framework and timelines on the cleanup work so that Hanford meets current environmental standards.

Description of Proposed Milestones*

Task Name	Date	Description
M-45-50	9/2000	Complete development of a spectral gamma logging baseline for single-shell tank farms
M-45-50-T01	3/1999	Issue final baseline spectral gamma logging report for A tank farm
M-45-50-T02	9/1999	Issue final baseline spectral gamma logging report for T tank farm
M-45-50-T03	3/2000	Issue final baseline spectral gamma logging report for B tank farm
M-45-51	8/1999	Submit DOE's Phase 1 RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) Work Plan for Single-Shell Tank Waste Management Areas
M-45-52	10/1999	Submit Site-Specific Single-Shell Tank Waste Management Area Phase 1 RFI/CMS Work Plan addenda for waste management area S-SX
M-45-52-T01	4/1999	Submit preliminary site-specific Single-Shell Tank Waste Management Area Phase 1 RFI/CMS Work Plan addenda for waste management area S-SX
M-45-53	5/2000	Submit site-specific Single-Shell Tank Waste Management Area Phase 1 RFI/CMS Work Plan addenda for waste management area B-BX-BY
M-45-54	12/2000	Submit site-specific Single-Shell Tank Waste Management Area Phase 1 RFI/CMS Work Plan addenda for waste management areas T and TX-TY
M-45-55-T01	4/2001	Submit Field Investigation Report pursuant to the site-specific Single-Shell Tank Waste Management Area Phase 1 RFI/CMS Work Plan addenda for waste management area S-SX
M-45-55-T02	5/2002	Submit Field Investigation Report pursuant to the site-specific Single-Shell Tank Waste Management Area Phase 1 RFI/CMS Work Plan addenda for waste management area B-BX-BY
M-45-55-T03	6/2003	Submit Field Investigation Report pursuant to the site-specific single-shell tank waste management area Phase 1 RFI/CMS Work Plan addenda for waste management areas T and TX-TY
M-45-55	2/2004	Submit Phase 1 RFI Report integrating results of data gathering activities and evaluations for waste management areas S-SX, T, TX-TY, and B-BX-BY and related groundwater monitoring activities
M-45-56	TBD	Complete implementation of agreed-to interim measures
M-45-56-T01	10/1999	Summarize results of engineering studies and recommendations on isolating water lines in or near single-shell tank waste management areas, sealing abandoned wells in or near single-shell tank waste management areas, and controlling surface drainage at single-shell tank waste management areas and submit results to Ecology
M-45-57	6/1999	Complete upgrading of leak-tight caps on monitoring drywells around single-shell tanks
M-45-58	TBD	Submit a Corrective Measures Study for interim corrective measures (pending results and conclusions from the Phase 1 RFI Report--Milestone M-45-55 or subsequent RFI Reports)
M-45-59	TBD	Control surface water infiltration pathways as needed to control or significantly reduce the likelihood of migration of subsurface contamination to groundwater at the single-shell tank waste management areas (pending the Corrective Measures Report, Milestone M-45-58, and implementation of other interim corrective measures)
M-45-59-T01	7/1999	Summarize results of Innovative Treatment Remedial Demonstration workshop, with conclusions and recommendations for testing and evaluation of interim surface barrier concepts and submit results to Ecology
M-45-60	**	Submit DOE's RFI/CMS Work Plan for Single-Shell Tank Waste Management Areas as Tri-Party Agreement primary document

* Additional commitments among the Tri-Parties are included in the M-45-05 Milestone change package.

** Due date is six months following RCRA Facility Investigation Report approval

Hanford Public Information Repository Locations

SEATTLE

University of Washington
Suzzalo Library
Government Publications Room
(206) 543-4664 ATTN: Eleanor Chase

SPOKANE

Gonzaga University
Tri-Party Information Repository
Foley Center
East 502 Boone
(509) 323-3839 ATTN: Connie Scappelli

RICHLAND

U.S. Department of Energy Public Reading Room
WSU Consolidated Information Center, Room 101L
2770 University Drive
(509) 376-8583 ATTN: Terri Traub

PORTLAND

Portland State University, Branford Price Millar Library
Science and Engineering Floor
Tri-Party Information Repository
934 SW Harrison and Park
(503) 725-3690 ATTN: Michael Bowman

For more information, please contact:

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or call the Hanford Cleanup Toll-free Line: 1-800-321-2008