



Tri-Party Agreement

Change Proposed to Hanford's Tri-Party Agreement Establishing the Completion Date for the 324 Building Radiochemical Engineering Cells Closure

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 Tri-Party Agreement milestone date established by the schedule for the 324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated Areas Closure Plan. A top priority at Hanford is the removal of excess equipment, radioactive waste, and mixed waste from the 324 Building Radiochemical Engineering Cells and nearby tank vaults. A commitment to complete this action was included in the Tri-Party Agreement between the U.S. Environmental Protection Agency (EPA), the Washington State Department of Ecology (Ecology), and the United States Department of Energy (DOE). This commitment was represented as Tri-Party Agreement Milestone M-89-00. The milestone completion date was left "to be determined (TBD)". On September 1, 1998, Ecology approved a Closure Plan submitted by DOE that established a date of October 31, 2005 for completion of these activities. DOE, Ecology and EPA are proposing to set the completion date for Milestone M-89-00 at October 31, 2005 as well.

The DOE, the U.S. Environmental Protection Agency (EPA), and the Washington State Department of Ecology (Ecology) are seeking public comment on the proposed milestone completion date. The 45-day public comment period is scheduled for April 26 to June 10, 1999.

All public comments will be considered and responded to before final decisions are made. Because this proposed change to the Tri-Party Agreement is consistent with the existing project schedule and expected funding, public meetings are not currently scheduled. You may request a public meeting if you believe that public discussion is warranted and will improve this activity.

If you would like to review the proposed modification, or the current Closure Plan (DOE/RL-96-73, Revision 1) that supports the proposed completion date, please visit the public information repository nearest you, or review the proposed modification at the Tri-Party Agreement homepage: <http://www.hanford.gov/tpa/tpahome.htm>

To request a copy of the documents, or to submit comments either written or electronically, contact:

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

Background

The 324 Building, located on the Hanford Site near Richland, Washington, is being deactivated to meet state and federal cleanup commitments. It was constructed in 1965 in the 300 Area on the Hanford Site less than 300 meters from the Columbia River. The City of Richland has grown since that time, and now the 324 Building is less than three kilometers from the Washington State University Tri-Cities campus, public schools, and the north Richland residential area.

The 324 Building contains several highly radioactive tanks, piping, and pieces of chemical processing equipment. Large

shielded hot cells contain the equipment; nearby shielded vaults contain the tanks and piping. Historically, work within the hot cells included the demonstration of the vitrification process for high level waste now being used at the Savannah River and West Valley sites. The 324 Building was used for nuclear material research and radioactive waste treatment process development and demonstration. These activities are complete and the excess equipment and waste materials must be removed.

Some of the highly radioactive materials are considered "characteristic" and/or "dangerous" wastes. These are referred to as "constituents of concern" in the Closure Plan. The U.S. Department of Energy informed Ecology that these mixed wastes were being stored in several areas of the 324 Building. Since the 324 Building was not a permitted treatment, storage, and disposal (TSD) facility for dangerous wastes, Ecology determined that several areas of the 324 Building were non-compliant mixed waste TSD (dangerous waste storage) units.

Closure Plan

On February 7, 1995, the Tri-Parties agreed to the following: (1) Ecology would issue a Voluntary Compliance letter to document the areas of non-compliance associated with the 324 Radiochemical Engineering Cells and High-Level Vault, and (2) DOE and Ecology would negotiate TPA milestones to close the non-compliant TSD units. The urgency of mitigating the imminent radiological hazard presented by the dispersible radioactive material in B-Cell drove the decision not to pursue a permit for the TSD or to grant it interim status, but to continue the cleanout work. It was agreed that the TPA milestones would be sufficient to satisfy regulatory enforcement for the areas of non-compliance.

The Tri-Parties established the due date of December 1995 under Milestone M-20-55 to submit the 324 Building Radiochemical Engineering Cells and High-Level Vault Closure Plan. The original Tri-Party Agreement Milestone M-89-00 addressed the closure of the non-permitted mixed waste TSD units in the 324 Building, but left the due date "to be determined" (TBD). However, Milestone M-89-00 did establish several "interim milestones" and due dates. All of the interim milestones have been completed, with the exception of M-89-02. Milestone M-89-02 addresses the removal of all excess equipment and waste material from the 324 Building B-Cell and is now to be completed by November 30, 2000.

Ecology established the current Milestone M-89-00 due date of October 31, 2005, based on the schedule in the approved Closure Plan. The initial plan, submitted in December 1995, was returned by Ecology. Ecology approved the final revised Closure Plan on September 1, 1998. The approved Closure Plan and schedule are an enforceable compliance agreement between Ecology and DOE.

While specified areas of the 324 Building are undergoing clean closure, the entire building is undergoing deactivation. The strategy for the closure plan activities includes: cleanout of the subject areas, coordination with facility deactivation activities,

Historical Note

The U.S. Department of Energy's Richland Operations Office manages 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.

and the final closure for the areas and equipment. After the excess equipment and waste inventory are removed, the Radiochemical Engineering Cells, High-Level Vault, and Low-Level Vault, piping and miscellaneous areas will be decontaminated. If clean closure is not attainable, then closure surveillance and maintenance will be implemented.

Hanford Public Information Repository Locations

Portland

Portland State University
Branford Price Millar Library
Science and Engineering Floor
Tri-Party Information Repository
934 SW Harrison

Attn: Michael Bowman
Phone: (503) 725-3690

Richland

U.S. Department of Energy
Public Reading Room
Washington State University,
Tri-Cities
Consolidated Information Center,
Room 101L
2770 University Drive

Attn: Terri Traub
Phone: (509) 372-7443

Seattle

University of Washington
Suzzallo Library
Government Publications Room
East 502 Boone

Attn: Eleanor Chase
Phone: (206) 543-4664

Spokane

Gonzaga University
Tri-Party Information Repository
Foley Center

Attn: Connie Scarpelli
Phone: (509) 323-3839

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