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Revision 0

Waste Control Plan for the BC Cribs and Trenches Area in the 200-BC-1 Operable Unit

Prepared for the U.S. Department of Energy
Assistant Secretary for Environmental Management

Project Hanford Management Contractor for the
U.S. Department of Energy under Contract DE-AC06-96RL13200

FLUOR.

P.O. Box 1000
Richland, Washington



Approved for Public Release;
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Waste Control Plan for the BC Cribs and Trenches Area in the 200-BC-1 Operable Unit

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D. Todak
Fluor Hanford, Inc.

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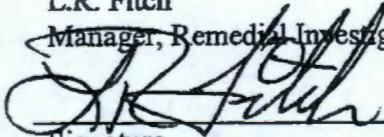
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Title: Waste Control Plan for the BC Cribs and Trenches Area in the 200-BC-1
OU

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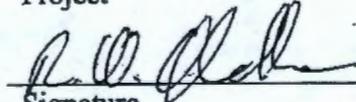
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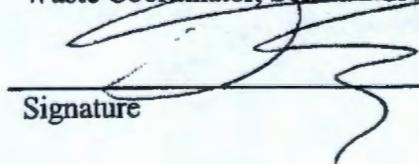
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D. Todak
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7-16-07
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WASTE CONTROL PLAN

Work Scope Description:

200-BC-1 Operable Unit (OU) characterization in the BC Cribs and Trenches Area. The scope of work includes installing wells, direct push technology boreholes, test pit excavations, and collecting soil and groundwater samples that will be analyzed for radiological and non-radiological contaminants of concern. Geophysical logging will also be conducted in the BC Cribs and Trenches Area. The initial waste site to be evaluated with up to 36 direct push boreholes is the 216-B-26 Crib. Also, up to five boreholes are to be drilled to evaluate potential correlation of surface geophysical exploration (SGE) that focused on electrical resistivity characterization data with soil contaminant concentrations. Additionally, decommissioning of the direct push boreholes and some existing wells will be performed upon completion or as deemed necessary in future years. Finally, the treatability test includes the planned excavation of near-surface contamination at three specific waste sites, the 216-B-26 Trench, the 216-B-53A Trench, and the 216-B-14 Crib.

List Contaminants of Concern:

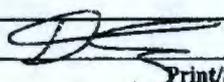
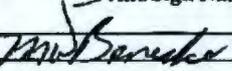
Contaminants of concern at the 200-BC-1 OU include radionuclides, metals, anions, and volatile and semi-volatile organic compounds. See SGW-34278, *Data Quality Objective Summary Report for the Designation of Investigation-Derived Wastes in the 200-BC-1 Operable Unit*.

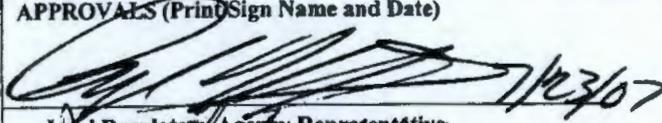
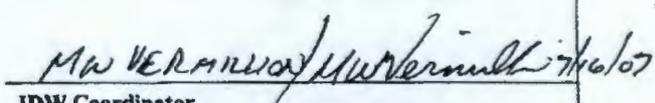
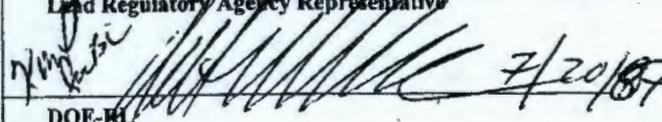
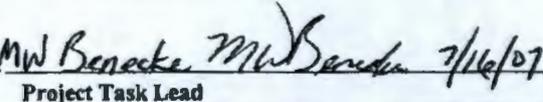
Site Description:

Waste sites in the 200-BC-1 OU include the BC Cribs and Trenches south of the 200 East Area of the Hanford Site in southeastern Washington State. The OU includes 24 waste sites that were formerly in the 200-TW-1 OU and 4 that were in the 200-LW-1 OU. The OU includes 6 cribs, 20 trenches, a siphon tank, and a pipeline. Figure 1 shows the location of these waste sites as well as the locations of the planned boreholes. Additional information on these sites is presented in DOE/RL-2000-38 and DOE/RL-2003-44.

References:

DOE/RL-2000-38, *200-TW-1 Scavenged Waste Group Operable Unit and 200-TW-2 Tank Waste Group Operable Unit RI/FS Work Plan, Rev. 0 Addendum Draft A*
 DOE/RL-2003-44, *BC Cribs and Trenches 200-TW-1 Operable Unit Borehole Sampling and Analysis Plan, Rev. 0*
 DOE/RL-2007-13, *Draft A, Sampling and Analysis Plan for High-Resolution Resistivity Correlation for the BC Cribs and Trenches Area*
 DOE/RL-2007-14, *Draft A, Sampling and Analysis Plan for Phase 1 of the BC Cribs and Trenches Area Waste Sites Excavation-Based Treatability Test*
 D&D-31659, *Geophysical Investigations by High Resolution Resistivity for the BC Cribs and Trenches Area, 2004-2006*
 Date Approved July 2007

Preparer: <u>Davjd Todak</u>  <u>Print/Sign Name</u>	Date <u>7-16-07</u>	Impact Level N/A
Project Task Lead: <u>M.W. Benecke</u>  IDW Coordinator: <u>M. W. Vermillion</u> 		
Planned Drilling Start and Finish Dates: From: September 2007 <u>July 07</u> To: September 2008		
Waste Storage Facility ID Number(s) N/A <u>mwb 7/17/07</u>		

WASTE CONTROL PLAN				
Field Screening Methods				
Method	Frequency	Reference	Detection Limit or Range	Analyst
Alpha/beta-gamma detector	Continuous	DOE/RL-2007-13, Draft A DOE/RL-2007-14, Draft A	100 d/min alpha 1921 d/min gamma-beta	RCT
Dose rate, gamma	Continuous	DOE/RL-2007-13, Draft A DOE/RL-2007-14, Draft A	0.5 mR/h	RCT
Photo ionization detector, 11.7, and 11.8 eV lamp for organics	As required in the Health and Safety Plan	DOE/RL-2007-13, Draft A DOE/RL-2007-14, Draft A	0 to 1,000 ppmv	SSO
Spectral gamma logging	Section 1.4.3	DOE/RL-2007-14, Draft A	Table 2-1	Contracted borehole logger
Laboratory Methods (Contaminants of concern)				
Method	Frequency	Reference	Detection Range	Analyst
Tables 1-5 and 3-8	Section 3.2	DOE/RL-2007-13, Draft A	Table 1-5	On or off site Laboratory
Table 2-2	Section 1.4.3	DOE/RL-2007-14, Draft A	Table 2-2	On or off site Laboratory
<p>200-BC-1 OU Drill Site Location: Multiple locations have been identified for installation of boreholes through direct push and drilling methods as shown in Figure 1.</p> <p>Decommissioning: The only wells currently identified for decommissioning in this OU are the direct push boreholes to be installed as described above and shown in Figure 1. As additional wells are identified for decommissioning, approval will be sought and granted through discussion at the Unit Manager's Meeting (UMM) and recorded in the UMM minutes.</p> <p>Waste Container Storage Area(s) Coordinate Location(s): Two waste container storage areas will be established in the BC Cribs and Trenches Area to manage the investigation-derived wastes generated by the proposed drilling, excavating, sampling and decommissioning activities. If these locations need to be moved to accommodate future work, such changes will be approved in Unit Manager's Meetings.</p> <p>Requirements for Spoils Pile Sampling (if any): Not applicable - All drill cuttings/spoils will be containerized.</p> <p>Non-regulated Material Disposal Location(s): An off-site Subtitle "D" landfill can be used for disposal of non-regulated miscellaneous solid waste that has been surveyed for radiological release in accordance with <i>PHMC Radiological Control Procedures</i> (HNF-13536), Section 4.1.1, "Standard Radiological Release Survey for Material and Equipment." Non-regulated soil waste may be returned to the ground at or near the point of excavation in accordance with GRP-EE-02-14.5: <i>Returning Vadose Zone Drill Cuttings/Soils to the Environment</i>, the location of which will be documented in the field logbook. Liquid wastes (e.g. purgewater, decontamination fluids) will be collected and taken to the Purgewater Storage and Treatment Facility (PSTF) or the Effluent Treatment Facility (ETF).</p> <p>200-BC-1 OU Sketch of Work Site: Figure 1 identifies the borehole locations and waste container storage areas at the BC Cribs and Trenches Area.</p>				
APPROVALS (Print Sign Name and Date)				
 Lead Regulatory Agency Representative		 MW Veranwa / MW Veranwa 7/16/07 IDW Coordinator		
 DOE-RI		 MW Benecke / MW Benecke 7/16/07 Project Task Lead		

ATTACHMENT 1

DESCRIPTION OF WORK

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TERMS

CERCLA	<i>Comprehensive Environmental Response, Compensation and Liability Act of 1980</i>
ERDF	Environmental Restoration Disposal Facility
ID	identification
IDW	investigation-derived waste
MSW	miscellaneous solid waste
OU	operable unit
PPE	personal protective equipment
PUREX	Plutonium-Uranium Extraction (Plant)
RCRA	<i>Resource Conservation and Recovery Act of 1976</i>
RCT	radiological control technician
REDOX	Reduction-Oxidation (Plant)
TRU	transuranic (waste materials contaminated with 100 nCi/g of transuranic materials having half-lives longer than 20 years)
TSD	treatment, storage, and disposal
WAC	<i>Washington Administrative Code</i>
WESF	Waste Encapsulation and Storage Facility

1.0 DESCRIPTION OF WORK

This waste control plan (WCP) governs the management of investigation-derived waste (IDW) generated at the BC Cribs and Trenches (Figure 1) under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA). The planned work scope includes activities detailed in the *Sampling and Analysis Plan for Electrical Resistivity Correlation for the BC Cribs and Trenches Area* (DOE/RL-2007-13, Draft A) and the *Sampling and Analysis Plan for Phase 1 of the BC Cribs and Trenches Area Waste Sites Excavation-Based Treatability Test* (DOE/RL-2007-14, Draft A), and *Excavation-Based Treatability Test Plan for the BC Cribs and Trenches Area Waste Sites* (DOE/RL-2007-15). The electrical resistivity characterization geophysical method is being applied at the BC Cribs and Trenches Area in an attempt to identify the lateral and/or vertical distribution of targeted contaminants of potential concern in the vadose zone. The treatability test will assess the field conditions related to removal, treatment, and disposal of near-surface contamination present in representative wastes sites.

The work activities currently planned include the drilling of five boreholes, the installation of numerous DPT boreholes, and excavation of near-surface contamination from selected waste sites. The five electrical resistivity characterization boreholes are a part of the ongoing analytical data correlation activities and will be located outside of individual waste site boundaries. The DPT boreholes and excavations are part of the excavation-based treatability test plan work scope and will be located in the 216-B-14 Crib, 216-B-26 Trench, and 216-B-53A Trench.

The DPT boreholes will not be constructed to meet current standards for construction and maintenance of wells and will be decommissioned. Although these are the only boreholes currently slated for decommissioning, there may be other wells in the 200-BC-1 OU that do not meet modern construction criteria and which will be similarly decommissioned. Waste generated from decommissioning activities is IDW and will be designated based on sample data and/or surrounding waste site characterization data.

Any wastes generated during this project will be managed in accordance with this waste control plan and state and Federal regulations. An overview of the waste management strategy for the 200 Areas waste sites is presented in Appendix E of DOE/RL-98-28, *200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program*. Every effort will be used to minimize waste generated during this project.

1.1 WASTE STREAMS

One or all of the below waste streams are anticipated and may fall into any combination of the following categories: transuranic (TRU), radioactive, mixed, hazardous, dangerous, suspect radioactive, suspect dangerous, suspect mixed, and nonregulated:

- Miscellaneous solid waste (e.g., rubber, glass, paper, personal protective equipment, cloth, plastic, metal)
- Drill cuttings, soils, and slurries
- Decontamination fluids

- Equipment and construction materials (e.g., well casing, drill string, drive barrel, construction equipment and materials, sampling equipment, decommissioning materials, wooden pallets)
- Nondangerous/no-radiation-added (nonradioactive) solid waste (e.g., paper, wood, construction debris, metal, plastic, glass)
- Unplanned release and associated cleanup material
- Well decommissioning waste (e.g. miscellaneous solid waste (MSW), drill cuttings, soils & slurry, decontamination fluids and purgewater, equipment and construction debris).

1.2 WASTE GENERATION AND MANAGEMENT

All waste generated will be recorded in the geologist and/or buyer technical representative logbook, with such details as the location and type of waste, depth of sample, date of initial placement into container, date the container was sealed, and Package Identification Number. Marking, labeling, segregation, and staging of waste containers will be performed in accordance with a waste packaging and labeling instruction or as directed by the waste management specialist.

Waste will be stored at the site-specific waste container storage area as shown in Figures 1 and 2. Future well decommissioning activities may require additional site-specific waste container storage areas, which will be approved in the Unit Manager's Meeting (UMM) and recorded in the UMM minutes. The IDW will be stored at these areas until analytical data are evaluated for proper waste designation and will be disposed of at the Environmental Restoration Disposal Facility (ERDF) if it meets the waste acceptance criteria specified in BHI-00139, Environmental Restoration Disposal Facility Waste Acceptance Criteria. If TRU waste is encountered, it will be sent to the Hanford Site Central Waste Complex for storage. In addition, if any waste needs to be transported to the Central Waste Complex, the EPA will be contacted to make an offsite determination before the waste is shipped. Any waste transported to the Central Waste Complex for storage must be dispositioned in accordance with the work plan required by TPA Milestone M-016-93 for TRU waste generated by CERCLA cleanup actions of the Hanford Site, and the final MO-016 Cleanup Schedule.

If, after designation of the waste is completed, the waste must be stored for longer than six months, the U.S. Department of Energy, Richland Operations Office (RL) will obtain concurrence from the lead regulatory agency on the schedule and location for disposition of the waste.

Details on the types and management of expected wastes are provided in the following subsections.

1.2.1 Miscellaneous Solid Waste

Well decommissioning wastes are to be treated as suspect dangerous or suspect mixed waste based on process knowledge and representative waste site characterization sample results. Refer

to the specific data quality objective for process knowledge and representative analytical data. Some waste associated with decommissioning may be considered environmentally controlled material or nondangerous/no-radiation-added solid waste based on process knowledge and representative analytical data. Decommissioning waste shall be containerized, marked, segregated, staged and dispositioned as stated below.

Miscellaneous solid waste (MSW) that has contacted suspect dangerous or suspect mixed waste will be treated and marked as such. Field screening will be used to segregate radioactive IDW from no-radiation-added (non-radioactive) IDW. The MSW will be placed in a plastic bag, taped closed, marked to indicate the associated borehole footage interval, and placed in container(s) specific to each area of potential contamination. Container(s) will be properly marked and labeled. Mark the container lid with IDW date, well name, start and close date, gross weight, sampling date and Waste Pending Analysis. The containers will be segregated from other materials, based on field screening results and location, and then staged at the designated site-specific waste container storage area. The containers of MSW will be dispositioned using analytical results obtained from the soil contacted.

1.2.2 Vadose Zone Drill Cuttings

Vadose zone drill cuttings are to be treated as suspect radioactive, dangerous, or mixed waste, based on process knowledge and field screening results. Drill cuttings shall be containerized in properly labeled mid-performance coated drums with 10-mil reinforced plastic liners to mitigate the spread of contaminants to the environment. Containers will be properly marked and labeled. Miscellaneous solid waste (MSW) that has contacted suspect dangerous or suspect mixed waste will be treated and marked as such. Field screening will be used to segregate radioactive IDW from no-radiation-added (non-radioactive) IDW. The MSW will be placed in a plastic bag, taped closed, marked to indicate the associated borehole footage interval, and placed in container(s) specific to each area of potential contamination. Container(s) will be properly marked and labeled. Mark the container lid with IDW date, well name, start and close date, gross weight, sampling date and Waste Pending Analysis. The containers will be segregated from other materials, based on field screening results and location, and then staged at the designated site-specific waste container storage area. The containers of MSW will be dispositioned using analytical results obtained from the soil contacted.

If screening levels indicate that the cuttings may be characterized as TRU waste, the cuttings containers also will have vented lids. The containers will be segregated from other materials, based on field screening results and location, and then staged at the designated site-specific waste container storage area. The containers of drill cuttings will be dispositioned using analytical results associated with the contaminated media contacted.

1.2.3 Decontamination Fluids

Decontamination fluids (water and/or non-dangerous cleaning solutions) generated from cleaning equipment and tools in the OU will be contained, transported, and discharged at the 200 Area Effluent Treatment Facility, or at the Hanford Site 600 Area Purgewater Storage and

Treatment Facility (ModuTanks)¹ in accordance with Appendix F of the *Hanford Federal Facility Agreement and Consent Order* (Ecology et al. 1989). If necessary, decontamination fluids can be containerized and stored at the designated site-specific waste container storage area.

Additional chemical decontamination of sample equipment may be conducted at the Waste Sampling and Characterization Facility, because decontamination and containment systems already are established at this location. The waste generated at the Waste Sampling and Characterization Facility is not considered IDW and will be managed in accordance with applicable regulations and requirements.

1.2.4 Equipment and Construction Materials

Equipment and construction materials in contact with suspect dangerous and suspect mixed waste will be decontaminated with a three-bucket wash or a high-temperature and high-pressure wash (180 °F and >1000 lbf/in²) within a wash basin capable of retaining rinsate, or it will be treated as MSW. All water used for decontamination activities shall be potable (i.e., Hanford Site potable water or City of Richland water). Rinsate shall be managed as described in Section 1.2.3. All sampling equipment shall be cleaned and decontaminated for chemical contamination after radiological release by a radiological control technician (RCT). If contamination is determined to be fixed for any equipment or materials, the radiological control technician and task manager will make the decision to remove the contamination using more aggressive methods or to dispose of the equipment. If necessary, equipment and construction materials can be containerized and stored at the designated site-specific waste container storage area.

1.2.5 Non-dangerous/No-Radiation-Added Solid Waste

All non-dangerous/no-radiation-added (non-radioactive) solid waste that is radiologically released will be disposed to an offsite solid-waste landfill. This waste will not have contacted any suspect dangerous or mixed waste and will be free of any liquids. Items in this category include paper, wood, construction debris, metals, plastic, food waste, glass, etc. A radiological release certification form and the well identification number and date of generation should be attached and visible from outside the trash bag. If necessary, non-dangerous/no-radiation-added solid waste can be containerized, segregated, and stored at the designated site-specific waste container storage area.

1.2.6 Unplanned Release

The initial response to emergency and non-emergency events and conditions shall follow the direction provided in the individual work location Health and Safety Plan (HASP). Once the initial assessment is completed and appropriate measures have been taken to curtail and contain the spill or release, the waste specialist will ensure that compatible waste container(s) are properly marked, labeled, and segregated from other materials based on process knowledge, field screening results, and location and then will be staged at a designated site-specific waste

¹ ModuTank is a trademark of ModuTank Inc., Long Island City, New York.

container storage area. The containers will be dispositioned using analytical results or process knowledge. These actions will be conducted in accordance with the requirements of WAC 173-303-145, "Dangerous Waste Regulations," and 40 *Code of Federal Regulations* (CFR) 302, "Designation, Reportable Quantities, and Notification."

1.3 MANAGEMENT OF WASTE CONTAINERS

The containers will be stored inside the applicable site-specific waste container storage area. The waste container storage areas shown in Figure 1 may be relocated within or adjacent to the identified waste sites to accommodate changes in the field operations. If a waste container storage area is relocated, the lead regulatory agency will be notified before the change and relocation of the waste container storage area. Containers awaiting analytical results will be marked and labeled "Waste Pending Analysis and date of sampling," as prescribed in the preceding sections. Weekly inspections will be performed to document the integrity, container marking/labeling, physical container placement, storage area boundaries/identification/warning signs, and spill control. Containers showing signs of deterioration will be identified on the container inspection form and immediately will be overpacked or repackaged. Spills or releases will be reported as stated above. In the event of a spill or release, appropriate immediate action will be taken to protect human health and the environment.

1.4 STORAGE AND FINAL DISPOSAL

It is anticipated that all IDW will be stored at the site-specific waste container storage area until the waste samples are returned and the proper waste shipping papers are completed. In the event that samples returns are delayed, the majority of waste containers may be shipped for disposal, provided that sufficient, appropriate containers remain in the WCSA for packaging of samples upon their return. The process to develop proper waste shipping papers includes the following: receipt of analytical results, designation, profiling, and proper disposal-related paperwork. The designation process ensures that the waste will be profiled for the proper disposal facility. Waste profiling provides information concerning each waste stream. The designation and profiling are conducted in accordance with dangerous waste regulation requirements (WAC 173-303-070, "Designation of Dangerous Waste" through 173-303-100). Dangerous waste will be evaluated for applicable land disposal restrictions in accordance with WAC 173-303-140, "Land Disposal Restrictions." The presence of polychlorinated biphenyls will be evaluated in accordance with the *Toxic Substances Control Act of 1976* and WAC 173-303-9904, "Dangerous Sources List." Radiological wastes will be determined to be acceptable for near surface (onsite) disposal if the concentrations of radionuclides are below those in BHI-00139.

The IDW that does not meet the ERDF waste acceptance criteria will remain at the designated site-specific waste container storage area pending disposal at an appropriate location. A case-by-case disposal determination will be made in instances where IDW exceeds the ERDF waste acceptance criteria. Any IDW requiring treatment before disposal, and/or disposal at an off site facility, requires approval by the lead regulatory agency.

Wastes that cannot be radiologically released that do meet the ERDF waste acceptance criteria will be transported to the ERDF for disposal (ERDF is an "onsite" approved waste disposal facility). Non-radiologically contaminated dangerous waste may be shipped onsite to ERDF or

to an offsite facility, contingent upon the waste meeting the offsite disposal facility's waste acceptance criteria and offsite determination of acceptability by the U.S. Environmental Protection Agency.

If TRU levels of contamination are encountered, the suspect waste will be placed within engineered segregated boundaries of the designated storage area and posted according to radiological posting requirements. After representative samples are analyzed and the material is designated/characterized, the proper disposal facility will be selected. If the Central Waste Complex (CWC) is selected for long-term storage, soil sample(s) designated as TRU waste will be returned and placed back into the stored waste drum associated with the interval from which the sample was taken before it is shipped. Offsite determination of acceptability for waste selected for long-term storage at CWC will be obtained from the U.S. Environmental Protection Agency. In addition, if any waste needs to be transported to the Central Waste Complex, the EPA will be contacted to make any offsite determination before the waste is shipped. Any waste transported to the Central Waste Complex must be dispositioned in accordance with the work plan required by TPA milestone M-016-93 for TRU waste generated by CERCLA cleanup actions at the Hanford Site and in accordance with the final M-016 cleanup schedule.

Miscellaneous solid waste identified as non-dangerous/no-radiation-added solid waste that does not require disposal at ERDF and meets the Hanford Site free-release criteria may be disposed of in an appropriate solid waste disposal facility (Subtitle "D" landfill).

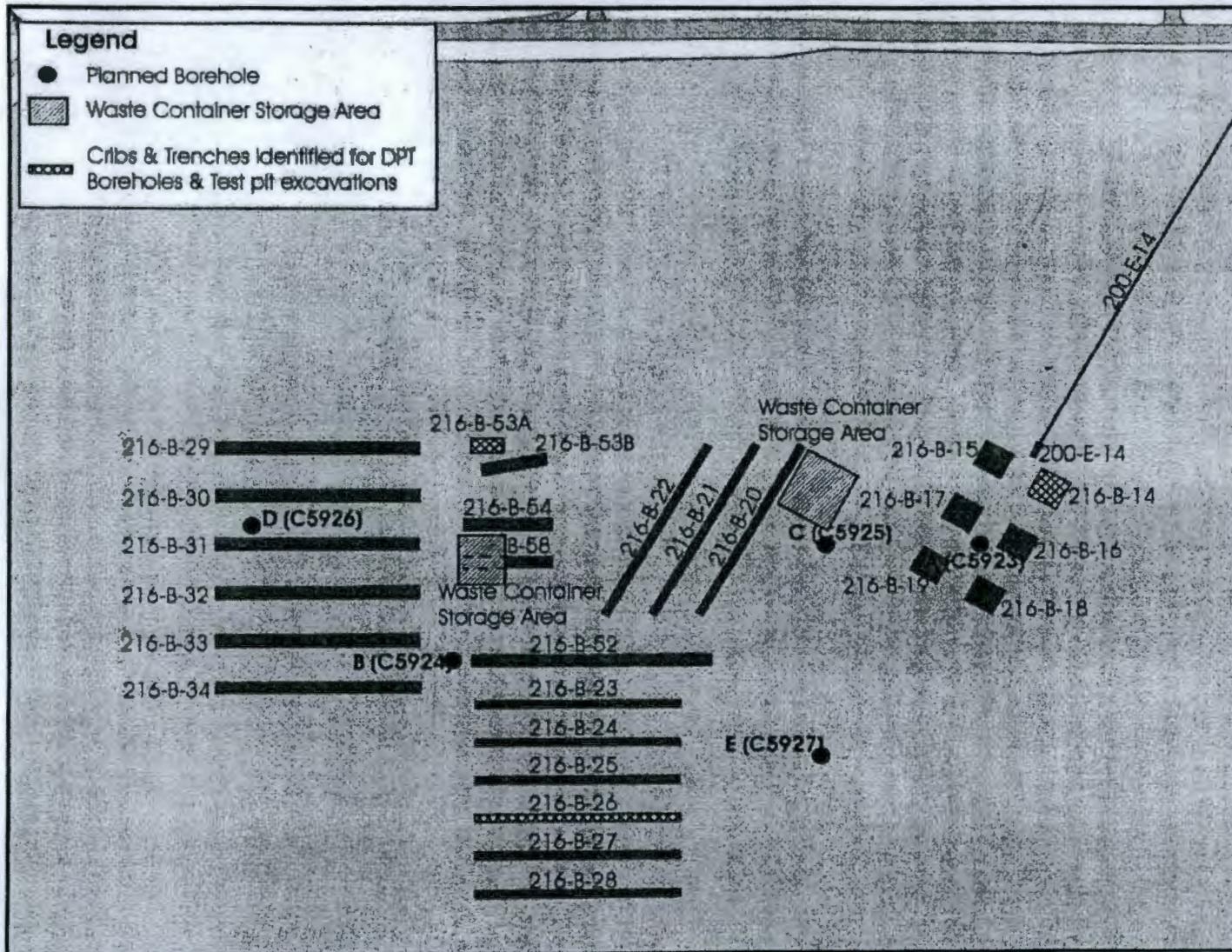
1.5 RECORDS

Original copies of all sampling records, waste inventory documentation, and waste container certification forms will be forwarded to the assigned waste management specialist to be included in the waste file and to initiate waste tracking in the *Solid Waste Information Tracking System*. The completed waste files will be included in the project file following final waste disposition in accordance with applicable records management processes.

1.6 ESTIMATE OF INVESTIGATION-DERIVED WASTE QUANTITIES

Estimates of the amount of waste that will be generated during this field investigation are given in Table 1. These quantities are based on IDW generated during previous 200 Areas drilling activities.

Figure 1. 200-BC-1 Location Map and Waste Container Storage Areas



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Table 1. Estimate of Investigation-Derived Waste Quantities.

Operable Unit	Method	Liquid Wastes	Soil Wastes	Miscellaneous Solid Waste	
		Purgewater and decon fluids (drums ^a)	Cuttings	PPE/Trash (drums ^a)	Disposable Equipment
200-BC-1	Drilling	10	50 (drums ^b)	15	1000 linear feet drill casing 1000 linear feet 2.5" push rod
200-BC-1	Decommissioning	N/A	N/A	TBD	TBD
200-BC-1	Excavation	N/A	15,000 yards	50	TBD

^a208-L (55-gal) drums.

^bpurgewater.

PPE = personal protective equipment.

2.0 REFERENCES

- 40 CFR 302, "Designation, Reportable Quantities, and Notification," Title 40, *Code of Federal Regulations*, Part 302, as amended.
- 90-ERB-040, 1990, *Strategy for Handling and Disposing of Purgewater at the Hanford Site, Washington* (letter to P.T. Day, U.S. Environmental Protection Agency, and T.L. Nord, Washington State Department of Ecology, from R.D. Izatt), U.S. Department of Energy, Richland Operations Office, Richland, Washington, July 19, 1990.
- DOE/RL-98-28, 1999, *200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program*, Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland, Washington.
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- DOE/RL-2003-44, 2003, *BC Cribs and Trenches 200-TW-1 Operable Unit Borehole Sampling and Analysis Plan*, Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland, Washington.
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