



# Focus

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## Proposed Procedural Closures for: Hanford's 221-T Containment System Tests Facility and 2727-WA Sodium Reactor Experiment Sodium Storage Building

## Proposed Clean Closure for: Waste Encapsulation and Storage Facility Tank 100 System

The Washington State Department of Ecology (Ecology) is seeking your comment on a proposal by the U.S. Department of Energy (USDOE) to *procedurally close* the 221-T Containment Systems Test Facility and the 2727-WA Sodium Reactor Experiment Sodium Storage Building. In addition, the Waste Encapsulation Storage Facility Tank 100 System also is being proposed for *clean closure* under the federal Resource Conservation and Recovery Act (RCRA).

### Procedural Closure

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A procedural closure is identified in section 6.3.3 of the Tri-Party Agreement. A procedural closure takes place when a unit is classified as a treatment, storage and disposal (TSD) unit (subject to RCRA requirements), but was never used to treat, store or dispose of dangerous waste, thereby exempting the unit from RCRA requirements.

### Background

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- ◆ The **221-T Containment Systems Test Facility** is located inside of T Plant, which is located in the 200 West Area. Initially, the 221-T Containment Systems Test Facility was a research laboratory that performed experiments with alkali metal compounds. This unit was also intended to treat dangerous alkali metal waste by heating the waste in a treatment tank equipped with an off-gas system. However, no wastes were treated in the 221-T Containment Systems Test Facility.

The U.S. Department of Energy (USDOE) filed a RCRA "Part A" permit application on August 15, 1987, to treat waste at the 221-T Containment Systems Test Facility. On June 22, 1989, USDOE submitted a request to the Department of Ecology to withdraw the 221-T Containment Systems Test Facility, "Part A" permit application, as required by the Hanford Tri-Party Agreement. Ecology approved the request for withdrawal pending results of the formal decision-making process required by WAC 173-303-840.

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The USDOE wants the 221-T Containment Systems Test Facility to no longer be considered a TSD unit and to make it available for other uses, pending approval of the request.

- ◆ The **2727-WA Sodium Storage Building** is located west of U Plant in the 200 W Area and is a prefabricated (Butler-type) metal building. In 1977, 158 steel containers (with capacity of 208 liters each) of contaminated sodium waste were transferred to the Hanford Site for storage after use by Atomics International as primary coolant in its Sodium Reactor Experiment (SRE) reactor.

The USDOE filed a RCRA "Part A" application on November 25, 1987, to store waste at the 2727-WA Sodium Storage Building for periods of greater than 90 days. In 1988 and 1989, respectively, the U.S. Department of Energy, Chicago Operations Office and the Westinghouse Hanford Company performed a regulatory analysis on the 2727-WA sodium. Both analyses concluded that the SRE sodium is not a dangerous waste. Therefore, a "Part A" permit application withdrawal was requested on June 22, 1989; subsequently, the Washington State Department of Ecology granted preliminary approval to withdraw on August 17, 1989. Presently, all of the SRE sodium containers have been removed from the 2727-WA.

The USDOE wants to initiate the decision-making process on the 2727-WA SRE Sodium Storage Building. If the request is approved, the 2727-WA SRE Sodium Storage Building will no longer be considered a TSD unit and will be available for other uses.

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## Clean Closure

Clean closure is a status given to a former TSD unit that has had all dangerous wastes and constituents removed. The complete clean closure of any unit will be carried out in accordance with all applicable requirements described in chapter 173-303 of the Washington (State) Administrative Code.

- ◆ The **Tank 100 System** is located below grade south of the Waste Encapsulation and Storage Facility (WESF) in the 200 E Area. The Tank 100 System was used as a catch tank to transfer low-level radioactive waste from WESF through B Plant to the double-shell tank system. Although the Tank 100 System had been managed as a low-level radioactive-waste storage system not subject to the requirements of the (RCRA), it was determined in February 1998 that the system had been storing mixed waste. Therefore, the Tank 100 System is being closed in accordance with the requirements of WAC 173-303-610.

The USDOE filed a closure plan on September 3, 1998, that describes the closure strategy, performance standards, and closure activities that are being performed. The closure activities described in the plan were completed in September 1998.

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## How can you get involved?

Ecology has tentatively decided to approve this closure plan, but must hear your views or concerns before making a final decision. A 45-day public-comment period will begin **December 11, 1998**, and end on **January 24, 1998**. To request a public hearing, please call The Hanford Hotline at 800-321-2008 before December 17, 1998. However, at the current

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time there is no hearing planned. All comments received during the public-comment period will be considered and responded to before the final decisions are made on these proposals.

For more information, or to mail your written comments regarding the proposed procedural closures of the **221-T Containment Systems Test Facility** and the **2727-WA SRE Sodium Storage Building**, please contact:

*Greta Davis, Department of Ecology  
1315 W. 4<sup>th</sup> Avenue, Kennewick WA 99336-6018.  
(509) 736-3025*

For more information, or to mail your written comments regarding the proposed clean closure of the **Tank 100 System**, contact:

*Ted Wooley, Department of Ecology  
1315 W. 4<sup>th</sup> Avenue, Kennewick, WA 99336-6018  
(509) 736-3012*

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

**Lockheed Martin Services  
2440 Stevens Center Place, Suite 101  
Richland, WA 99352  
Debbie Isom, (509) 376-2530**

If you have special accommodation needs or require this material in an alternative format, please contact Lori Guertin, (509) 736-3007 (voice) or (360) 407-6206 (TDD).

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