



Proposed Modifications to the Dangerous-Waste Portion of the Hanford Facility-Wide RCRA Permit

Background

A facility-wide Dangerous Waste RCRA Permit (permit) was issued in August 1994 for the Hanford Site by the Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency. The permit was granted under provisions of the federal Resource Conservation and Recovery Act (RCRA) and the Washington State Dangerous Waste Regulations. The permit outlines conditions for the operation and closure of dangerous and mixed waste treatment, storage and disposal (TSD) units at Hanford.

Approximately 50 TSD units at Hanford are operating under RCRA interim status. Two of the units described in this focus sheet will be incorporated into the permit, transferring them from interim status to final status. After incorporating them into the permit, general conditions apply. In addition, individual units will be subject to conditions based on their status as operating, clean-closed, or post-closure.

The Modification Process

The Washington State Dangerous-Waste Regulations, WAC 173-303-830(3)(a) identify when Ecology may modify a permit. General condition II.D has been modified to include the most recent regulatory updates.

Parts III and V have been modified as a result of new information submitted by the permittees. In addition, site-wide emergency response documentation has been revised in response to the May 1997 explosion at the Plutonium Reclamation Facility. It is anticipated there will be additional modifications of the Hanford Emergency Response Plan (DOE RL 94-02) as the improved Emergency Response System is used. The U.S. Department of Energy-Richland Operations Office (USDOE-RL), Fluor Daniel Hanford, Inc., Pacific Northwest National Laboratories, and Bechtel Hanford, Inc. were notified by Ecology of the proposed changes.

Statement of Basis Note

Washington State Dangerous-Waste Regulations require Ecology to prepare a "statement of basis" when a fact sheet is not prepared for the proposed permit modification(s). An extensive fact sheet was prepared for the Hanford Dangerous Waste Permit in September 1994. Modifications are being made in accordance with Washington Administrative Code (WAC) 173-303-830(3)(a). This focus sheet satisfies the purposes of both the fact sheet and the statement of basis.



1998 Modifications to the Dangerous Waste Portion of the Hanford Facility-Wide RCRA Permit

The 1998 modifications to the permit include: incorporating two new operating units; updated emergency response-documentation for all permitted operating units; incorporating five new closure plans; modifying six existing operating permits; and modifying one existing closure plan.

Two newly permitted operating units (Part III) include:

- ◆ **The Waste Receiving and Processing Unit (WRAP)**
WRAP will be permitted under RCRA to process previously packaged, dangerous, and mixed radioactive wastes. WRAP will also process transuranic and low-level radioactive waste under Atomic Energy Act regulations. The waste is screened, characterized, documented and, when needed, repackaged for shipment to permitted TSD facilities.
- ◆ **The Central Waste Complex (CWC)**
CWC in the 200 West Area provides storage and treatment for dangerous, mixed, and/or radioactive waste generated on and off the Hanford Site. Buildings, storage modules - and a storage pad provide space for waste containers. Storage capacity at CWC is approximately 100,000 55-gallon drum equivalents.

New emergency-response documentation for permitted operating units:

- ◆ As part of the corrective measures to the **Plutonium Reclamation Facility** explosion on May 14, 1997 the Hanford Site's emergency-preparedness documentation has been modified. The USDOF has been granted a temporary authorization to implement these procedures, because the annual Hanford Facility RCRA permit-modification process incorporating these documents will not be completed until December 1998. USDOE began using the new Emergency Preparedness Program on July 1, 1998. Site wide emergency response documentation has also been revised to reflect improvements in the Emergency Response Organization. As a result, a common, streamlined emergency response document has been developed. The document is a combination of the previously used documents, *DOE/RL 93-75* and *DOE/RL 94-02*.

The modification of six existing operating permits:

- ◆ **616 Non-radioactive Dangerous-Waste Storage Facility (616 NRDWSF)**
Modifications are being made to the Waste Analysis Plan, the Training Plan and the Building Emergency Plan.
- ◆ **Liquid Effluent Retention Facility (LERF) and 200-Area Effluent Treatment Facility (ETF)**
Modifications are being made to operational practices, the Waste Analysis Plan and the Building Emergency Plan.
- ◆ **Plutonium-Uranium Extraction (PUREX Storage Tunnels)**
Modifications are being made to the Building Emergency Plan.



- ◆ **242-A Evaporator**
Modifications are being made to the inspection requirements and the Building Emergency Plan.
- ◆ **325 Hazardous-Waste Treatment Units (HWTU's)**
Modifications involve only the emergency-response documentation, WAP and operational requirements.
- ◆ **305-B Storage Unit**
Modifications involve only the emergency-response documentation.

The five new closure plans (Part V):

- ◆ **100-N Area** includes *four* TSD units that received liquid discharges to the soil column. These closure plans have been approved by Ecology after a public-review period that ended on April 30, 1998. These documents have already been through the required public comment period and are being administratively incorporated into the permit.
- ◆ **The 100-D Ponds TSD unit** is located adjacent to and north of the perimeter fence of the 100-D Area on the Hanford Site. This TSD was constructed as an unlined surface impoundment for liquid effluent and operated between 1977 and 1994. While this TSD unit primarily received non-radioactive, non-dangerous liquid effluent from the 100-D Area process sewer system, it also intermittently received characteristic dangerous waste. In August 1996, the U. S. Department of Energy voluntarily removed and appropriately disposed the contaminated sediments from 100-D Ponds, thereby establishing a "clean closed" status.

The modification of one existing clean closure plan (Part V)

- ◆ **The 303-K Storage Facility** is located in the northwest portion of the 300 Area. The 303-K Storage Facility is a small, single-story cinderblock building on a concrete pad. Various radioactive and dangerous wastes have been stored in the building and on nearby concrete, asphalt and gravel pads. Characterization for hazardous constituents has been completed according to the permit requirements. The permit update extends the date by which the permittee must submit closure certification.

How can you get involved?

A 45-day public-comment period will start **August 10, 1998** and conclude **September 24, 1998**. If requested, a public hearing will be held at Ecology's Kennewick Office, 1315 W. 4th Ave., on September 9, 1998. To request a public hearing, please call The Hanford Hotline at 800-321-2008 before August 15, 1998. All comments received during the comment period will be considered and responded to before the final decisions are made on these proposals.

Copies of the dangerous-waste portion of the Hanford Facility-Wide RCRA Permit and the proposed 1998 modifications are available for review at these **Hanford Public Information Repositories**:
(For additional information, call Hanford Cleanup toll-free at 800-321-2008.)

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If you have special accommodation needs, or require this material in an alternative format, please contact Michael Turner, (509) 736-3037 (voice) or (360) 407-6206 (TDD).

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
Debbie Isom, (509) 376-2530
Mon.-Fri. 9a.m.-noon/1-3:30p.m.

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