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Tri-Party Agreement

Change Notice for Modifying Approved Documents/ Workplans
In Accordance with the Tri-Party Agreement Action Plan,
Section 9.0, *Documentation and Records*

Change Number	Document Submitted Under Tri-Party Agreement Milestone	Date:
TPA-CN-207	N/A	

Document Number and Title:
SGW-34277, Rev. 0, Waste Control Plan for the BC Cribs and Trenches Area in the 200-BC-1 Operable Unit

Date Document Last Issued:
July 2007

Originator: B. L. Foley **Phone:** 376-7087

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Description of Change: Update to provide for waste generated during excavation of 216-B-26 Trench.

B. L. Charboneau ~~M. S. McCormick~~ and R. Lobos agree that the proposed change modifies an approved document

RL **Lead Regulatory Agency**

and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, *Documentation and Records*, and not Chapter 12.0, *Changes to the Agreement.*

- Section 1.0, add new paragraph, placed between current 3rd and 4th paragraphs: "Near-surface contamination will be removed from the 216-B-26 Trench, the 216-B-14 Crib, and the 216-B-53A Trench in accordance with DOE/RL-2007-15, *Excavation-Based Treatability Test for the BC Cribs and Trenches Area Waste Sites*. Focus is on collecting information to refine worker and dose estimates for excavation of highly contaminated near-surface soil, and assessing subsidence potential of remnant crib structures. Not all material removed will be disposed of as waste; the top few feet will be reserved for later return to the excavation, unless it is required to treat (down blend) the highly contaminated soil to meet ERDF acceptance or transportation requirements."
- Section 1.2, 2nd para, 1st sentence: Change … "area" … to …"areas" …
- Section 1.2.4, 1st para, Add new sentence following 1st sentence: "Steam cleaning may be used if other methods are ineffective."
- Add new Section 1.2.3 Excavation Waste (Renumber following sections)
  "Material removed during excavation of near-surface contaminated soil is to be treated as suspect radioactive, dangerous, or mixed waste, based on process knowledge and field screening results. In addition to contaminated soil, remnant steel casing (2.5-in. diameter) from previous direct push technology hole (DPT) installation will be removed. The ERDF waste acceptance criteria BHI-00139, *Environmental Restoration Disposal Facility Waste Acceptance Criteria*) size reduction requirements will be used. Soil and debris will be containerized on site (e.g., containers, bulk shipment) and transported to the ERDF, located near the 200 West Area. Low-level radioactive waste and/or hazardous waste are acceptable for disposal at the ERDF in accordance with the waste acceptance criteria (BHI-00139, *Environmental Restoration Disposal Facility Waste Acceptance Criteria*). 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 from no-radiation-added (non-radioactive) waste. Containers will be properly marked and labeled. 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.
  Visible dust emissions from active excavations are not permitted and will result in work suspension. Active excavations shall use water or other methods for dust control, in accordance with agreements between the U.S. Department of Energy, Richland Operations Office (DOE-RL), EPA and the Washington State Department of Health. Water usage for dust control shall be minimized to protect against contamination migration. Crusting agents or fixatives shall be applied to any disturbed portion of the contamination area that will be inactive for more than 24 hours. Material to be disposed at ERDF shall also comply with the moisture content and other applicable requirements of BHI-00139, *Environmental Restoration Disposal Facility Waste Acceptance Criteria*."
- Add new Section 1.4.1 Material Handling and Transportation
  "All contaminated materials, including excavated soils, debris, disposable protective clothing, and trash, will be properly packaged, handled, and transported in accordance with this Waste Control Plan. Contaminated bulk materials will be hauled in the standard ERDF open-top, hinged-gate roll-off boxes that are designed for a maximum payload of approximately 18.1 metric tonnes (20 tons) or an approved alternative. The bulk containers will be transported on roll-on/roll-off trailers with hydraulic dumping capabilities that are towed by conventional tractor units. Containers will be transported from the BC Cribs and Trenches Area to the ERDF over existing Hanford Site roadways. Each shipment transported to ERDF will be referenced to a

waste profile that is intended to bound the levels of hazardous constituents in the material found at the waste site. The waste profile is in effect unless and until the characteristics of the excavation site change significantly. Empty containers returning from the ERDF will be removed from the ERDF tractor trailers in the CERCLA Waste Management Area and rolled on to project haul trucks for refilling.

Containers and ERDF haul trucks being released from radiologically-controlled areas will meet exterior contamination limits for staging and transport."

- Section 1.6, second sentence: Revise to "These quantities are based on IDW generated during previous 200 Areas drilling and excavation activities." (shaded material is new)
- Figure 1: Additional WCSA for the ERDF containers is provided. See Attachment 1.
- Table 1: Revise as shown below

Table 1. Estimate of Investigation-Derived Waste Quantities.

Operable Unit	Method	Liquid Wastes	Soil Wastes	Miscellaneous Solid Waste	
		Purgewater and decon fluids (drums[a])	Containers	PPE/Trash	Disposable Equipment
200-BC-1	Drilling	10	50 drums[a]	15 drums[a]	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	10	300 ERDF roll-off boxes[b]	50 drums[a]	TBD

[a]208-L (55-gal) drums.
[b]ERDF roll-off box max payload: 18.1 MT (20 tons).
PPE = personal protective equipment.

Justification and Impacts of Change:

The change provides expanded description of bulk waste management/control.
The updates made by this change will be reflected in the next revision (Revision 1) of SGW-34277.

Approvals:

RL Project Manager	3-26-08 Date	X Approved	__ Disapproved	
EPA Project Manager (200-BC-1 OU Lead)	3/28/08 Date	X Approved	__ Disapproved	
	____ Date	__ Approved	__ Disapproved	

Attachment 1.