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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

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CC Recd: 08/21/2002

AUG 19 2002

02-PMO-0003

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Mr. E. K. Thomson, President
Fluor Hanford, Inc.
Richland, Washington 99352

Dear Mr. Thomson:

CONTRACT NO. DE-AC06-96RL13200 - RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) ASSESSMENT – A&E-SEC-02-009

RL's Analysis and Evaluation Division (A&E) conducted an assessment of the 224-T Process Cells during the months of February and June 2002.

Enclosed for your information is a copy of the report detailing the results of this assessment. The assessment focused on Fluor Hanford, Inc. (FHI) compliance with the Hanford Site RCRA permit requirements for identification, treatment, storage, and disposal of mixed waste.

The contractor's compliance with the RCRA Permit requirements was considered Satisfactory. There were no Findings and four Observations. No response from FHI is required. The assessment is rated as "green" - meets requirements.

If you have any questions concerning this matter, you may contact me, or your staff may contact Steve Chalk of RL on (509) 372-8589.

Sincerely,

Sally A. Sieracki

Sally A. Sieracki
Contracting Officer

PMO:SEC

Enclosure

cc w/encl:
G. J. LeBaron, FHI
A. G. Miskho, FHI

SIGNATURE PAGE

Prepared by: _____ 8/14/02

Steve Chalk
Analysis and Evaluation Division, Lead Assessor

Date

_____ 8/14/02

Dave Roha
Analysis and Evaluation Division, Assessor

Date

EXECUTIVE SUMMARY

The U.S. Department of Energy (DOE), Richland Operations Office (RL), Analysis and Evaluation Division (A&E) began an initial potential mixed waste (PMW) assessment at 224-T Process Cells on February 19, 2002, during Phase I cell characterization. Additional assessment activities were conducted beginning June 3, 2002, during Phase II cell characterization. The scope of the assessment was to validate the status of PMW in the 224-T process cells and identify any other material that should be considered a PMW, and to assess the long-term safety posture of those items against Resource Conservation Recovery Act storage criteria/standards.

An entrance meeting was conducted on June 3, 2002, for the assessment of the Phase II cell characterization, at the Fluor Hanford Inc. (FHI) offices at MO-414 in the 200 East Area. The A&E assessment team and the FHI points of contact and subject matter experts attended the meeting. The assessment schedule and the areas to be assessed were discussed. An exit meeting was held on June 5, 2002, at MO-414.

Work in the process cells is being conducted in accordance with an Agreement in Principle (AIP) for characterizing the cells consisting of two phases. Phase I robotic inspections have been completed. Phase II began in late spring of 2002. Initial Phase I results have identified low levels of radioactivity in the cells, vessels, and piping systems. Phase I also discovered that C-Cell contains approximately 35,000 gallons of water in the pit, possibly due to rainwater runoff. The presence of water, in addition to the existence of a pipe trench connecting T-Plant to the 224-T process cells, and a soil subsidence in the same vicinity, indicate that rain water may be flowing into the pit in C-Cell. At the time of the initial assessment activities in February 2002, sampling had not been performed, and it was not known whether this constituted a potential near-term environmental issue. In addition, the video inspection identified some scaffolding, tools, plywood, and other debris in F-Cell. Several cardboard boxes were also identified that may contain PMW. Further investigation during Phase II cell characterization determined that the water was not considered dangerous waste and contained low levels of radioactivity. Continuing cell characterization activities will include appropriate sampling of the remaining vessels and related equipment and management of the rainwater.

The assessment concluded in no Findings and four Observations. The first Observation concerns determining vessel inventories; the second Observation concerns using an informal procedure for monitoring the water level in the C-Cell; the third Observation concerns using an informal evaluation to identify the source of the water in C-Cell; the fourth Observation concerns the identification of a light bulb box with unknown contents in the cells and it's subsequent designation as PMW.

This assessment is rated as "green" –generally meets requirements.

1 INTRODUCTION AND SCOPE

A. Background

The 224-T process cells are inactive and may contain PMW. Part A for the adjacent Treatment Storage and Disposal (TSD) units exists. There is no Part A for the process cells, as they are not considered to be part of an interim status TSD unit. The 224-T Process cells are contained in a reinforced concrete structure previously used for processing and storing plutonium solutions (not active since 1956). There are no process vents meeting the regulatory definition at 224-T. Vessel ventilation is provided by the T-Plant powered exhaust/ventilation system that is managed in accordance with applicable Clean Air Act requirements. Not all vessels are vented and the specifics of which vessels are vented and their configuration is not known at this time. The chemical separation activities (cells) have been closed to general personnel entry since 1966. Current activities include making initial entries into the cells using a robotic system during Phase I cell characterization. The purpose of subsequent entries is to verify that there are no process solutions or chemicals left in the vessels or process system. There is an AIP (attachment 2) for characterizing the cells. Phase I robotic inspections have been completed. Phase II cell characterization activities began in late spring, 2002. Initial Phase I results have identified low levels of radioactivity in the cells and vessels/piping systems. The radiation levels indicate that the cells and related systems are not highly contaminated and supporting the information that vessel flushing was performed, probably circa 1966. Interviews with personnel who worked in the facility indicated that the systems were flushed; however, there are no available records documenting the actions taken prior to shutdown of the systems during 1956 to 1966. The recent robotic inspections identified waste materials in F-cell consisting of scaffolding, tools, plywood, other construction debris and cardboard boxes. In addition, approximately 11-1/2 feet of water was observed in the C-Cell pit. Initial investigation indicates that the source of the water is from rainwater leaking into the process piping trench between T-Plant and 224-T and then flowing into the C-Cell pit. In addition, it appears that two or three process vessels in the pit may also be filled with water, since the vessels do not appear to be lifted or displaced in the water. Further investigations are continuing during Phase II cell characterization of the cell area.

B. Assessment

This assessment covers the issue of PMW identification and subsequent handling and storage. The purpose of this assessment was to provide information for DOE's Annual Land Disposal Restrictions (LDR) Report (HFFACO Milestone M-26-01). The scope of the assessment was to validate the status of PMW in the 224-T process cells and identify any other material that should be considered a PMW, and assess the long-term safety posture of those items against RCRA storage criteria/standards.

Third party assessments are conducted by DOE to evaluate the total picture of how well the Hanford contractor's (in this case, FHI) management system complies with the applicable regulatory requirements and standards. This assessment was performed using a graded approach

which performed a selected sampling review of records, facility inspections, and personnel interviews, tailored to the specific activities being performed at the 224-T process cells.

2 METHODS

A&E began an initial PMW assessment at 224-T Process Cells on February 19, 2002, during Phase I cell characterization. Additional assessment activities were conducted beginning June 3, 2002, during Phase II cell characterization. An assessment entry meeting was held at MO-414 in the 200 East Area on June 3, 2002. The assessment team members were identified. The purpose of the assessment was declared and the scope of the assessment was described. The conduct of the assessment was reviewed along with the assessment schedule. The assessment was conducted using the process of A&E procedure A&E-01, "Evaluation of Contractor Performance in Meeting Waste Management Storage Requirements."

The method used for this assessment was a combination of document review and interviews. The inside (video tapes) and the outside of the facility were inspected and regulatory documents were reviewed to develop the areas of primary focus for the assessment. The documents used to develop the checklist (attachment A) for the assessment included the interim status provisions of WAC 173-303 and 40 CFR, as non-requirement criteria for evaluating PMW.

The RL Contractor Oversight and Evaluation Planning process provides the mechanism whereby RL personnel (mission element, mission support, and support service) evaluate contractor performance to ensure work is performed in accordance with the applicable requirements. This process also provides the mechanism to evaluate the adequacy of the contractors' management and independent assessment program and fulfills an important part of the feedback and improvement function of the RL Integrated Management System (RIMS). This process supports implementation of DOE M 411.1A, "Safety Functions, Responsibilities and Authorities Manual," DOE P 450.5, "Line Environment, Safety, and Health Oversight," and DOE O 224.1, "Contractor Performance Based Business Management Process."

Assessment Team Members

Laura Ruud, of the Washington State Department of Ecology (Ecology) provided initial guidance for the initial assessment in order to assist the RL.

DOE Team Members:
David Roha
Steve Chalk

3 RESULTS

Attachment A, documents the comparison of the criteria/requirements to the potential mixed waste. Below are the results of the assessment. The assessment found that the PMW in the CY2001 LDR Report contains the correct matrices. The cell water can be removed from the CY2002 LDR Report based on the recent analytical results showing the water to be non-dangerous.

3.1 GENERAL

1) Waste determinations and treatment standards (WAC 173-303-140, 40 CFR 268): Information to determine what waste codes would apply to the matrices has not been obtained, except for the cell water. Subsequent to the assessment fieldwork, the information on the cardboard boxes has been obtained. Until information is obtained to determine waste codes, an evaluation to determine treatment standard applicability cannot be made. Prior to making a waste determination on vessel residues, Phase II cell characterization activities must determine if there is an inventory in the process vessels.

   Observation A&E-SEC-02-009-O001 was identified regarding the need to determine vessel inventories.

2) WAP (WAC-173-303-300): A WAP was not prepared for the process cells. Phase II activities are intended to obtain information about contaminants and to determine if vessels have an inventory.

   No additional issues were found.

3) Facility Security (WAC-173-303-310): The facility has posted the correct warning signs on the outside of the facility and at all entry points. The doors and gates to the secured areas were locked.

   No issues were found.

4) Inspections (WAC-173-303-320): There is no existing inspection schedule for the process cells, however there is an AIP for characterizing the cells. Phase I, robotic inspections, have been completed. Phase II began in late spring of 2002. Initial Phase I results have identified low levels of radioactivity in the cells and vessels/piping systems. The radiation levels indicate that systems are not highly contaminated and that some level of flushing was performed. Video inspections identified some debris in F-Cell and approximately 11-1/2 feet of water in the C-Cell pit. No operational logs are maintained. Documents reviewed:

   - Inspection video.
   - Work Procedures:

Work Packages:
FA-02-00009/0, "224T Phase 2 Entry Survey and NDA";
FA-01-00002/W, Cell Entry of 224T Facility"
FA-01-00001/M.
HNF-7509, Revision 0, "224-T Entry Plan"
Radiological Work Permits:
RC-01-026, Rev. 002
RC-01-028, Rev. 006
RC-01-029, Rev. 1
RC-01-035, Rev. 3
Radiological Survey Report, RC01359, "200-West/224T, B-Cell"
WSCF Analysis Results Report, Report 20020306, March 18, 2002 (Analysis of water from C-Cell)

Discussions with the contractor staff indicated that monitoring of the water level in C-Cell was being done on an informal basis. No formal inspection procedural requirement was in place to ensure that this inspection was identified for completion and results recorded. The assessment team recommends that this inspection be incorporated into the routine facility inspection processes to ensure routine completion and recording of data.

Observation A&E-SEC-02-009-O002 was identified regarding the need to formalize a requirement to monitor the water level in C-Cell.

5) Personnel Training (WAC-173-303-330): Training records indicated that the training coordinator was assigned, that applicable courses were listed, and personnel requiring training in their particular areas were current as required. The written training plan had the necessary content, training frequencies, and training techniques. Job descriptions were matched to the training requirements covering requisite skills, education, qualifications, and duties for each position. It was clear that the training was relevant to the positions and the work being performed in 224-T process cells. Documents reviewed:

- RCP-8884, "River Corridor Project, 200 Area Deactivation Project, Dangerous Waste Training Plan (DWTP)."
- Training records for two of three Nuclear Chemical Operators (NCOs) that had completed recent facility quarterly inspections.

No issues were found.

6) Preparedness, Contingency Plan, and Emergencies (WAC 173-303-340, 350 & 360): The facility's emergency preparedness plan was established to meet both RCRA requirements for TRUSAF and DOE requirements. However, because there are no personnel permanently located at the facility, no permanent emergency equipment, communications equipment, warning systems, personal protective equipment, or spill control and containment supplies were located in the facility surrounding areas. The team uses cell phones for communications for emergency notifications.

Document reviewed:

- HNF-IP-0263-200-ADP, Revision 1, "Building Emergency Plan, 200 Area Accelerated Deactivation Project."

No issues were found.

7) Facility Records (WAC-173-303-380): Because the process cells are not part of an interim status unit, operating records are not maintained. There are no facility records available relating to process cell operation since it had become an inactive facility in 1956. Current video inspection procedures were available for review. When the water in C-Cell was first discovered during Phase I cell characterization, an occurrence report, RL-PHMC-GENERAL-2001-0009, was generated that addressed the root cause, immediate actions necessary, corrective actions, environmental impacts, etc.

   Document reviewed:

   - Occurrence report, RL-PHMC-GENERAL-2001-0009

   No issues were found.

8) Closure and post closure (Tri-Party Agreement (TPA) Action Plan 5.3, WAC 173-303-610): Closure and post closure plan have not been issued. Characterization of the process cells is being performed pursuant to an AIP. Selection of appropriate closure standards will be discussed with the TPA lead regulatory agency project manager.

   Document reviewed:

   - AIP, "Hanford Federal Facility Agreement and Consent Order (Agreement) Negotiation of Commitments for the 224-T Facility," dated June 22, 1999.

   No issues were found.

3.2 SPECIFIC

1. Use and management of containers (40 CFR 265, Sub I): At the time of the assessment field activities, two cardboard boxes were identified inside the F-Cell by robotic inspection; contents unknown. Subsequent to assessment field activities, the boxes were removed and activity managed.

   Observation A&E-SEC-02-009-O004 was identified regarding the need to list the material in the cardboard boxes as PMW on the LDR report PMW.

1.1) Condition of containers (265.171): From the robotic video, the boxes appear to be in good condition and intact. Based on historical practices, most of this material /construction debris is not expected to be PMW. However, one box has labeling that indicates it may contain light bulbs, a PMW. See observation A&E-SEC-02-009-O004.

1.2) Compatibility of waste with containers (265.172). It is unlikely that the matrix in the cardboard boxes is incompatible with the box. Historical uses of these boxes were to dispose of low-level radioactive waste at Hanford burial grounds.

No issues were found.

1.3) Management of Containers (265.173): The containers were closed and were not ruptured.

No issues were found.

1.4) Inspections (265.174): See general discussion regarding inspections.

1.5) Ignitable, reactive, or incompatible waste (265.176 and .177). Although it is not known, it is unlikely that the matrix in the cardboard boxes is ignitable, reactive, or incompatible.

No issues were found.

1.6) Air emission standards (276.178): See discussion above regarding Subpart AA discussions.

No issues were found.

1.7) Labels (WAC 173-303-630(3)): The two cardboard boxes were not labeled according to the WAC requirements.

No issues were found.

1.8) Secondary Containment (WAC 173-303-630(7)): Secondary containment is not provided for the two cardboard boxes. It is unlikely that the boxes contain a matrix requiring secondary containment.

No issues were found.

2. Tank systems (40 CFR 265, Subpart J): There are 28 vessels including six centrifuges, located in the six cells. C-Cell has water in the pit. The water covers process vessels in the pit.

2.1) Tank integrity inspection, Independent Qualified Registered Professional Engineer assessment and secondary containment (265.191, .192, and .193): The systems were shutdown in 1956 and are not actively used to store, treat or dispose of dangerous waste.

No issues were found.

2.2) General operating requirements and inspections: (265.194 and .195): The systems have not been operated since shutdown in 1956 and are not actively used to store, treat or dispose of dangerous waste. No inspections were made of the cells since they were closed in 1966.

No issues were found.

2.3) History of leaks or spills and tank fitness for continued use (265.196): There are no records available concerning past leaks or spills. A campaign to cleanout the cells and related vessels and systems was concluded in 1966 at which time the cells were locked. There is no planned future use for the systems.

No issues were found.

2.4) Closure and post closure (265.197): Interviews with personnel who worked in the facility indicated that the systems were flushed; however, there are no available records documenting the actions taken prior to shutdown of the systems between 1956 and 1966. During phase I cell characterization approximately 11-1/2 feet of water was observed in the C-Cell pit. The initial informal evaluation indicates that the source of the water is from rainwater leaking into the process-piping trench between T-Plant and 224-T and then flowing into the C-Cell pit. An occurrence report, RL-PHMC-GENERAL-2001-0009, documents the finding of the water in C-Cell. Initial estimates were 150,000 liters and approximately eleven feet deep. The contractor engineering staff briefed the assessment team on their evaluation of the water concern in C-Cell. While the information provided would be important for future corrective actions, it has not been formalized in a report/electronic correspondence, etc. that would provide a basis for further evaluation or use in finalizing corrective action plans. The team recommends that all engineering/technical evaluations and studies performed be formalized in acceptable written records.

Observation A&E-SEC-02-009-O003 was identified regarding the need to formalize the technical evaluation of the water in C-Cell.

In addition, it appears that two or three process vessels in the pit may also be filled with water, since the vessels do not appear to be lifted or displaced in the water. Video inspection also identified some scaffolding, tools, plywood and other debris in F-Cell that may be PMW. Further investigation/sampling during Phase II cell characterization of the cell area determined that the water was not considered dangerous waste and contained

low levels of radioactivity. Continuing inspections will include appropriate sampling of the remaining vessels and related equipment and management of the rainwater issue.

2.5) Ignitable, reactive, or incompatible waste (265.198 and .199): The systems may contain residual chemicals from a defined process with known chemicals. None of the chemicals are considered reactive.

No issues were found.

2.6) Labels (WAC 173-303-640(5)(d)). The vessels are not labeled according to the requirements. The systems have not been operated since shutdown in 1956 and are not actively used to store, treat or dispose of dangerous waste.

3) Containment Building (40 CFR 265 Subpart DD): The recent robotic inspections identified waste materials in F-cell consisting of scaffolding, tools, boxes, plywood and other construction debris associated with sealing the cells. Historical knowledge about the process cells concludes that these items should not appear on the PMW table in the LDR report.

No issues were found.

3.1) Closure and Post closure care (265.1102). Historical knowledge is sufficient to conclude these items are not PMW.

No issues were found.

4 FINDINGS AND OBSERVATIONS

4.1 FINDINGS

4.1.1 None

4.2 OBSERVATIONS

4.2.1 Observation A&E-SEC-02-009-O001: Vessel inventories have not been determined.

Information to determine what waste codes would apply to the matrices has not been obtained except for the cell water. In addition, it appears that two or three process vessels in the pit may also be filled with water, since the vessels do not appear to be lifted or displaced in the water. Prior to making a waste determination on vessel residues, further inspection activities must determine if there is an inventory in the process vessels.

4.2.2 Observation A&E-SEC-02-009-O002: Informal monitoring of water level in C-Cell.

The assessment team was told that the water level in C-Cell would be monitored by video inspection once a month until removed. No formal inspection procedural requirement was in place to ensure that this inspection was identified for completion and results recorded. The assessment team recommends that this inspection be incorporated into the routine facility inspection processes to ensure routine completion and recording of data.

4.2.3 Observation A&E-SEC-02-009-O003: Informal technical evaluation of C-Cell water concern.

The contractor engineering staff briefed the assessment team on their evaluation of the water concern in C-Cell. While the information provided would be important for future corrective actions, it has not been formalized in a report/electronic correspondence, etc. that would provide a basis for further evaluation or use in finalizing corrective action plans. The team recommends that all engineering/technical evaluations and studies performed be formalized in acceptable written records.

4.2.4 Observation A&E-SEC-02-009-O004: Unknown contents of a light bulb box in the process area not identified as PMW.

Video inspection identified a cardboard box that may contain light bulbs in the process cell area. This material should be listed on the LDR report, Appendix C. Subsequent to The assessment field activities, the boxes were removed, inventoried and actively managed.

5 PERSONNEL CONTACTED

G. J. LeBaron, FH
G. B.Chronister, FH
A. G. Miskho, FH
S. Giamberardini, FH

Attachment – Assessment Checklist

WAC 173-303 or 40 CFR citation	Requirement	Applies to location for evaluation (Y/N)?	Meets requirement (Y/N)?	Comments
	Matrices Investigated: • Vessel inventory • Cell Water • Cardboard boxes • Scaffolding and construction debris			
General Requirements				
WAC: -140	LDR refers to 40 CFR 268			
268.7(a)(1)	Has a waste determination been performed to assign waste codes?	Y	N	The cell water has been shown through sampling and analysis to be non-dangerous. Additional information is expected to be obtained during Phase II cell characterization activities.
268.7(a)(1)	Can a treatment standard be assigned to the matrix?	Y	N	No applicable to cell water since its non-dangerous. The waste determination must be completed first for the other matrices.
268.7(a)(1)	Is the treatment standard met for the matrix?	Y	N	The waste determination must be completed first.
268.7(a)(2), (3), and (4)	Has the required information been submitted to the receiving storage or treatment unit/facility?	N		
268.7(a)(5)	Has treatment-by-generator requirements been used? Is a waste analysis plan necessary?	N		
268.7(a)(6)	Has knowledge for contaminated soil been retained in records?	N		
268.7(a)(7)	Is the matrix excluded from the definition of hazardous waste or solid waste? Is the explanation in the records?	N		
268.7(a)(8)	Are LDR records maintained on site for 3 years.	N		
268.7(a)(9)	Will a labpack be managed using the alternative treatment standards?	N		
WAC: -280	General requirements for dangerous waste management facilities. Is there a Part A? Is the location included?	Y	Y	No eminent hazards are believed to exist in the process cells. The site location number is a site wide provision
WAC: -281	Notice of Intent	N		
WAC: -282	Siting Criteria	N		

WAC 173-303 or 40 CFR citation	Requirement	Applies to location for evaluation (Y/N)?	Meets requirement (Y/N)?	Comments
WAC: -283	Performance standards. Are they met?	Y	Y	The Hanford Site meets the performance standards.
WAC: -300	General Waste Analysis. Is there a detailed description of waste that has been received? Is there a waste analysis plan per (5) and (6)? Get copy. Does the plan meet the criteria?	Y	N	
WAC: -310	Security. Are there signs posted, or 24-hour surveillance, or barrier, per (2)?	Y	Y	
WAC: -320	General Inspections: Is there a written schedule per (2)? Get copy. Is there an inspection log? Get copy from last month. Have any problems been remedied?	Y	N	
WAC: -330	Personnel training. Is there a training program? Is there a written training plan per (2)?	Y	Y	
WAC: -335	Construction Quality Assurance	N		
WAC: -340	Preparedness & Prevention. Is required equipment identified? If not, has demonstration been performed per (1)? Are there communications or alarms per (2)? Is aisle space maintained per (3)?	Y	N	
WAC: -350	Contingency Plan and emergency procedures. Is there a contingency plan? Get copy. Does it contain criteria in (3)? Is a copy maintained per (4)? Is it up to date per (5)?	Y	Y	
WAC: -355	SARA Title III	Y	Y	This is a site-wide provision.
WAC: -360	Emergencies. Is there an emergency coordinator per (1) (BED/BW)? Has there ever been an emergency? If so, were procedures implemented per (2)?	Y	Y	224-T maintains an emergency coordinator. An emergency is not known to have occurred.
WAC: -370	Manifest system. Has waste received been manifested or transferred with on-site shipping records?	N		
WAC: -380	Facility recordkeeping. Is there an operating record? If so, does it contain the information per (1)? Are records maintained per (2)?	Y	N	Records from Phase I and Phase II activities will be maintained.
WAC: -390	Facility Reporting. Has any unmanifested waste been reported per (1)? Has information been included in annual reports per	N		

WAC 173-303 or 40 CFR citation	Requirement	Applies to location for evaluation (Y/N)?	Meets requirement (Y/N)?	Comments
	(2)? Has any additional information been reported per (3)? Are copies maintained per (4)?			
WAC: -395	Other general requirements. Does ignitable, reactive, or incompatible matrices exist at the location? If so, are precautions in (1) taken? Are tanks and containers labeled per (6)?	Y	N	Ignitable, reactive, or incompatible matrices are not expected at 224-T.
WAC: -610	The TPA Action plan requires closure pursuant to WAC 173-303-610. 40 CFR Subpart G is not used for closure of TSD units at Hanford.			
WAC: -610(2)	Has closure standard to remove or decontaminate been met?	Y	N	
WAC: -610(3)	Is there a written closure plan? Does the plan meet the criteria? Is the plan current?	Y	N	
WAC: -610(3)(c)	Has there been notification of partial closure?	Y	N	
WAC: -610(4)	Are timeframes met for closure? Has a demonstration for delay of closure been submitted?	Y	N	
WAC: -610(5)	Has waste been removed, treated, or disposed per approved closure plan per –610(5)?	Y	N	
WAC: -610(6)	Has certification of closure been submitted to Ecology?	Y	N	
WAC: -646	Corrective Action. Has there been a release? If so, were any corrective actions taken? Get any documentation.	Y	N	
265 Subpart AA	Air emissions for process vents. Are there process vents per .1030? If yes, is unit subject to requirements?	N		
265 Subpart BB	Air emissions standards and equipment leaks	N		
265 Subpart CC	Air emissions for tanks, containers, and surface impoundments	N		Mixed waste is exempt from Subpart CC requirements.
Specific Requirements				
WAC: -400(3)(a)	The types of waste management requirements for 40 CFR Subparts for this location include: -Containers (Subpart I) -Tank System (Subpart J)			

WAC 173-303 or 40 CFR citation	Requirement	Applies to location for evaluation (Y/N)?	Meets requirement (Y/N)?	Comments
	-Containment Building (Subpart DD)			
265 Subpart I	**Use and management of containers**			
265.171	Is container in good condition?	Y	Y	
265.172	Is waste compatible with the container?	Y	Y	Incompatible matrices are not expected.
265.173	Management of containers. Are containers closed? Are the containers managed to prevent rupture?	Y	Y	
265.174	Inspections. Are weekly inspections performed?	Y	N	
265.176	Ignitable and reactive waste. Are ignitable and reactive waste 50 feet from Hanford Site property line	Y	Y	
265.177	Incompatible waste. Are incompatible wastes separated or otherwise protected?	Y	N	Incompatible matrices are not expected.
265.178	Is waste managed in compliance with the air emission standards of Subpart AA, BB, and CC?	Y	Y	224-T does not have process vents subject to Subpart AA. There is no organic waste expected subject to Subpart BB. Mixed waste is excluded from Subpart CC.
WAC: -630(3)	Are containers labeled per –630(3)?	Y	N	
WAC: -630(7)	Are containers provided with secondary containment?	Y	N	Matrices requiring secondary containment are not expected.
265 Subpart J	**Tank Systems**			6 cells ~28 vessels
265.191	Has an integrity assessment been completed per .191? If so, get copy.	Y	N	
265.191	Is assessment certified by IQRPE per 270.11(d)?	Y	N	
265.192	Are new system components designed and installed per .192? If not, what's missing?	N		Designed prior to 1953.
265.193	Is there secondary containment for the tank(s) and ancillary equipment? If so, does it meet .193 requirement? If not, has a request for a variance been submitted .193(h)?	Y	N	Concrete cell. May or may not meet RCRA.
265.194	Are general operating requirements met per .194? List spill prevention controls and overfill prevention controls.	N		
265.195	Are inspections performed per	Y	N	See general requirement for

WAC 173-303 or 40 CFR citation	Requirement	Applies to location for evaluation (Y/N)?	Meets requirement (Y/N)?	Comments
	.195? Get copies of last month of inspections.			inspections
265.196	Has there been a leak or a spill? What? When?	Y		Don't know.
265.196	Is the tank unfit for use? If so, has criteria of .196 been met?	Y		Don't know.
265.197	Has waste been removed or decontaminated per .197? Is there a closure plan?	Y	N	See general discussions regarding closure.
265.198 & .199	Is there a clear understanding of what was placed in the tank system? If ignitable or reactive, did it meet ,198 requirements? If incompatible, did it meet .199 requirements?	Y	Y	Matrices are not believed to be ignitable, reactive, or incompatible. Phase II activities will gather more information.
265.200	Waste analysis and trial tests.	N		
WAC: -640(d)	Are tanks labeled per –640(5)(d)?	N		
265 Subpart DD	**Containment Buildings**			
265.1101	Design and operating. Does the containment building comply with the design standards of .1101?	Y	N	Free liquids are not expected
265.1102	Closure and post-closure. Has the matrices been removed or decontaminated?	Y	N	See general discussions regarding closure.

52097

i-Party Agreement

224-T PHASE I NEGOTIATIONS RESCHEDULE

The U.S. Department of Energy, Richland Operations Office (RL) and the State of Washington Department of Ecology had previously agreed in the June 22, 1999, 224-T Facility Agreement-in-Principle (AIP) to perform Phase I negotiations. The parties have been unable to address the 224-T Facility negotiation activities.

In light of the above, it is proposed that the Phase I due date and associated negotiations for 224-T be suspended indefinitely until the parties mutually agree to resume.

Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology

10/26/99
Peter M. Knollmeyer, Assistant Manager
for Nuclear Materials and Facility
Stabilization
U.S. Department of Energy

Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency

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ri-Party Agreement

AGREEMENT IN PRINCIPLE

Hanford Federal Facility Agreement and Consent Order (Agreement) Negotiation of Commitments for the 224-T Facility

Introduction:

The U.S. Department of Energy (DOE), Richland Operations Office (RL) and the Washington State Department of Ecology (Ecology), have held several discussions concerning the regulatory status and the most efficient path forward for DOE's 224-T Facility. Discussion has centered on a proposal, to which both Ecology and RL have tentatively agreed to manage 224-T Facility closure and decommissioning through the application of Agreement Section 8, "Facility Decommissioning Process," (in lieu of submittal of the currently scheduled Resource Conservation and Recovery Act (RCRA) closure plan, and management of 224-T fully under Agreement sections 6.0 and 7.0). This is proposed because the facility poses an apparent low risk to human health and the environment, and because closure requirements must be effectively integrated with other decommissioning activities.

The 224-T Facility consists of two contiguous entities. Transuranic Storage and Assay Facility (TRUSAF), which is a RCRA container storage unit, and the cell side which contains six nuclear process cells. The process cell side was last entered and the doors sealed in 1985. Accurate documentation of the current cell side state identifying what, if any, process chemicals, solutions, or wastes were left in the vessels, piping, or sumps is not sufficient. As a result, the regulatory standing of the 224-T cell side is uncertain.

During Fiscal Year 1999, RL will work to identify funding to characterize the process cell side of 224-T, and develop a safety characterization plan. DOE and Ecology also expect to establish initial Agreement milestones for 224-T Facility characterization, and activities that will subsequently allow the parties to determine the scope, and appropriate schedule for 224-T compliance and other decommissioning process activities.

Based on initial cell entry findings and consistent with site priorities, RL plans to complete characterization, analyze the data, and develop a preliminary plan of action in FY 2000. Upon completion of characterization and data analysis, a meeting will be conducted to discuss with Ecology what work should be undertaken in regards to the 224-T Facility Section 8 path forward.

In light of the proceeding, Ecology and DOE agree to the following:

Though 224-T is not being classified as a "key facility" under Agreement section 8.0, DOE and Ecology agree that necessary compliance (including closure), and other decommissioning requirements will be achieved through the application of Agreement section 8.0, instead of fully addressing 224-T through Agreement sections 6.0 and 7.0.

The Parties have entered into this AIP in order to establish the initial expectations and requirements for the closure and decommissioning of the 224-T Facility.

The parties also agree to the following:

1. That the current requirement for the submittal of a RCRA closure plan for the TRUSAF portion of the 224-T facility (due July 1, 1999) is hereby deleted. Applicable facility closure requirements will be established pursuant to Agreement section 8.0.

2. To enter into Phase I negotiations for the purpose of establishing Agreement commitments for the 224-T process cell characterization, entry/data collection and resulting data analysis. As part of these negotiations the Parties agree to establish a specific M-20-23 end date for completion of all characterization activities. After the process cell data is gathered, analyzed and reviewed by the Parties, Phase II negotiations will be scheduled and Agreement Section 8 Facility Decommissioning Process commitments and corresponding due dates will be established.

3. That Phase I negotiations shall commence on a date to be mutually agreed to by the parties (currently estimated for September 1999) and shall be completed no later than November 30, 1999. A weekly schedule of times and locations of negotiation sessions will be established by agreement between the Parties following the first negotiation session. The successful conclusion of negotiations shall be followed by an appropriate public comment period of not less than 45-days.

4. That Ecology, as the designated Lead Regulatory Agency for these negotiations, agrees to keep the U.S. Environmental Protection Agency (EPA) appropriately and currently informed regarding all pertinent aspects of the negotiations. DOE agrees to provide any reasonable assistance as requested to support Ecology in providing briefings or documentation to EPA. The Parties further agree to cooperate in providing periodic briefing opportunities to the State of Oregon, affected Indian Nations, the Hanford Advisory Board, and other stakeholders as appropriate.

5. That these negotiations shall stand in lieu of the dispute resolution processes established in the Agreement and that if the Parties are not able to resolve all issues in the negotiations, any unresolved matters, shall be referred for resolution under Article VIII for matters over which Ecology exercises final decision making authority and Article XVI for matters over which EPA exercises final decision making authority. Any dispute resulting from these negotiations shall be addressed beginning at the Inter Agency Management Integration Team level as described in the Agreement.

Approved this 22 day of June 1999

James E. Rasmussen, Director
U.S. Department of Energy
Richland Operations Office

Michael A. Wilson, Program Manager
State of Washington
Department of Ecology

Douglas R. Sherwood, Project Manager
U. S. Environmental Protection Agency

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STATE OF WASHINGTON
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May 12, 1999

Mr. James E. Rasmussen, Director
Environmental Assurance, Permits, and Policy Division
United States Department of Energy -- Richland Operations Office
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352-0550

Dear Mr. Rasmussen:

Re: Proposed Plan of Action for the 224-T Facility

Ecology has reviewed the letter dated April 27, 1999, directed to Mr. M. A. Wilson, Washington State Department of Ecology (Ecology), from Mr. James E. Rasmussen, Director, United States Department of Energy – Richland Operations Office (USDOE-RL), and concurs with the proposed course of action.

1. Manage the 224-T Facility as a "key facility" under Section 8 , "Facility Decommissioning Process" of the Hanford Federal Facility Agreement and Compliance Order (Tri-Party Agreement [TPA]), instead of preparing a RCRA closure plan.
2. During the course of FY 1999 identify funding to characterize the process cell side.
3. Develop a safety characterization plan.
4. Establish TPA milestones for tracking progress.
5. By June 1999, finalize an Agreement in Principle to guide TPA negotiations.

Upon completion of the above, and receipt and approval of the TPA change package, the closure of Transuranic Waste Storage and Assay Facility (TRUSAF) will be removed from Modification E of the Hanford Facility RCRA Permit.

If you have any questions, feel free to contact me (509) 736-5702.

Sincerely,

Robert J. Julian
Nuclear Waste Program

RJ:ld

cc: Doug Sherwood, EPA Loren E. Rogers, USDOE/RL Administrative Record: TRUSAF