



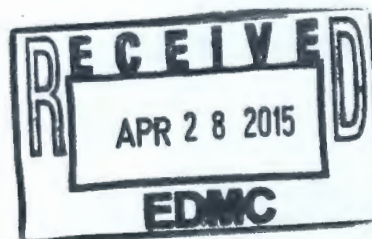
Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

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[0081403H]

15-AMRP-0151

APR 23 2015

Ms. J. A. Hedges, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton Blvd.  
Richland, Washington 99354



Dear Ms. Hedges:

**START OF CLOSURE EXTENSION REQUEST FOR MULTIPLE T PLANT AND WASTE RECEIVING AND PACKAGING (WRAP) FACILITY DANGEROUS WASTE MANAGEMENT UNITS (DWMU)**

This letter requests an extension in the date of expected closure in accordance with WAC 173-303-400(3)(a), which includes by reference 40 CFR 265.112(d)(ii), which states that the date when closure is expected to begin must be either: "Within 30 days after the date on which any hazardous waste management unit receives the known final volume of hazardous wastes, or, if there is a reasonable possibility that the hazardous waste management unit will receive additional hazardous wastes, no later than one year after the date on which the unit received the most recent volume of hazardous waste. If the owner or operator of a hazardous waste management unit can demonstrate to the Regional Administrator (Department) that the hazardous waste management unit or facility has the capacity to receive additional hazardous wastes and he has taken, and will continue to take, all steps to prevent threats to human health and the environment, including compliance with all interim status requirements, the Regional Administrator (Department) may approve an extension to this one-year limit."

In order to ensure compliance with WAC 173-303-400(3)(a), the U.S. Department of Energy Richland Operations Office (RL) has determined that the Solid Waste Operations Complex DWMUs listed below are affected by this requirement and still have the capacity to receive additional dangerous and/or mixed waste. These DWMUs are needed to support future Hanford Site waste management activities, as documented in RL's Project Management Baseline as well as RL's Ten Year Plan. RL is requesting that the expected date to begin closure of the following DWMUs be extended until such time that the final receipt of waste has occurred.

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**DWMUs Needing a Delay in the Start of Closure**

Operating Unit Group (OUG)	DWMUs
T Plant	221-T Canyon Deck 221-T Head End 221-T Operations Gallery Storage 221-BY Storage Area 2706-T Building 243-T Covered Storage Pad 214-T Building 211-T Cage
CWC-WRAP	2402-W Waste Storage Building 2402-WC Waste Storage Building 2402-WD Waste Storage Building 2336-W Building Shipping and Receiving area 2404-WB Waste Storage Building HERTR and Super HENC Waste Outdoor Storage Area

Further description of future needs, capacity, and the measures to prevent threats to human health and the environment are attached.

If you have any questions, please contact me, or your staff may contact Ray Corey, Assistant Manager for the River and Plateau, on (509) 373-9971.

Sincerely,



Stacy Charboneau  
Manager

AMRP:MSC

Attachment

cc: See page 3

Ms. J. A. Hedges  
15-AMRP-0151

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APR 23 2015

cc w/attach:

D. B. Bartus, EPA  
G. Bohnee, NPT  
R. Buck, Wanapum  
S. L. Dahl-Crumpler, Ecology  
B. J. Dixon, CHPRC  
R. H. Engelmann, CHPRC  
D. A. Faulk, EPA  
S. Harris, CTUIR  
S. Hudson, HAB  
M. N. Jaraysi, CHPRC  
R. Jim, YN  
S. K. Johansen, CHPRC  
K. Niles, ODOE  
J. B. Price, Ecology  
D. Rowland, YN  
D. G. Singleton, Ecology  
E. R. Skinnarland, Ecology  
**Administrative Record**  
Ecology NWP Library  
Environmental Portal  
HF Operating Record (J. K. Perry, A3-01)

## ATTACHMENT

Further description of future needs, capacity, and the measures to prevent threats to human health and the environment are provided below.

### T Plant Dangerous Waste Management Units (DWMU)

Anticipated Receipt of Additional Dangerous or Mixed Waste: Present plans are for the T Plant DWMUs included in this request to be used in the future for dangerous waste and mixed waste management activities in support of Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Action Plan Milestone M-091 and other Hanford Site cleanup actions including 105-K Fuel Storage Basins sludge treatment. These waste management activities are dynamic in nature and schedules are driven by federal budget allocations. Future waste management campaigns include venting and repackaging of transuranic mixed waste stored in drums to meet offsite disposal requirements, such as the Waste Isolation Pilot Plant. Wastes to be managed include low-level waste, mixed low-level waste, transuranic waste, mixed transuranic waste, hazardous/dangerous waste and Toxic Substance Control Act polychlorinated biphenyl waste. Closure of these units would be incompatible with the necessary continued operation of the T Plant Operating Unit Group (OUG).

Capacity to Receive Additional Waste: The T Plant OUG is permitted under interim status and has process and design capacity for container storage and treatment. The storage design capacity for the DWMUs is shown in the following table:

**Treatment and Storage Capacity for T Plant DWMUs**

DWMU	Treatment Capacity (Metric Tons/Day)	Storage Capacity (Liters)
221-T Canyon Deck	354.4 T04 90 T94	5,108,480
221-T Head End	0	8,320
221-T Operations Gallery Storage	0	114
221-BY Storage Area	0	591,168
2706-T Building	45.4	208,000 S01 13,191,000 X99
243-T Covered Storage Pad	0	591,168
214-T Building	354.4 T04	67,392
211-T Cage	0	19,968

Volumes are from Part A Permit Application submitted October 11, 2013.

Currently, no dangerous or mixed waste is being stored in these DWMUs. Consequently, the capacity is sufficient for management of additional dangerous or mixed waste.

Steps to Prevent Threats to Human Health and the Environment: For these DWMUs, the U.S. Department of Energy Richland Operations Office (RL) and CH2M HILL Plateau Remediation Company (CHPRC) have and will continue to take steps to prevent threats to human health and the environment, including compliance with all applicable interim status requirements. The design and operating procedures for these DWMUs allows for the storage and treatment operations to meet Resource Conservation and Recovery Act (RCRA) interim status standards. These RCRA compliance requirements include DWMU inspections, personnel training, and emergency preparedness.

Central Waste Complex-Waste Receiving and Packaging (CWC-WRAP) DWMUs

Anticipated Receipt of Additional Dangerous or Mixed Waste: As describe in the current RCRA Part A Permit for this unit, the CWC-WRAP DWMUs included in this request are expected to be needed in the future for dangerous and mixed waste activities in support of Tri-Party Agreement Action Plan Milestone M-091 and other Hanford Site cleanup actions including retrieval activities at the 618-10 and 618-11 Burial Grounds. These waste management activities are dynamic in nature and schedules are driven by federal budget allocations. Future campaigns for these DWMUs will include storage and treatment of mixed low level waste and transuranic mixed waste. Closure of this unit would be incompatible with the necessary continued operation of the CWC-WRAP OUG.

Capacity to Receive Additional Waste: The CWC-WRAP OUG is permitted under interim status and has process and design capacity for container storage and treatment. The storage design capacity for the DWMUs is shown in the following table:

**Treatment and Storage Capacity for CWC-WRAP DWMUs**

DWMU	Treatment Capacity (Metric Tons/Day)	Storage Capacity (Liters)
2402-W Waste Storage Building	0	334,500
2402-WC Waste Storage Building	0	334,500
2402-WD Waste Storage Building	0	334,500
2336-W Building - Shipping and Receiving Area	0	129,000
2404-WB Waste Storage Building	0	334,500
HERTR and Super HENC Waste Outdoor Storage Area	0	20,000

Volumes are from Part A Permit Application submitted Oct 11, 2013, with the exception of the HERTR and Super HENC Waste Outdoor Storage Area. The HERTR and Super HENC Waste Outdoor Storage Area storage capacity is estimated based on a unit with similar dimensions (the 211-T Cage).

Currently, no dangerous or mixed waste is being stored in these DWMUs. Consequently, the capacity is sufficient for management of additional dangerous or mixed waste.

Steps to Prevent Threats to Human Health and the Environment: For these DWMUs, RL and CHPRC have and will continue to take steps to prevent threats to human health and the environment, including compliance with all applicable interim status requirements. The design and operating procedures for these DWMUs allows for the storage and treatment operations to meet RCRA interim status standards. These RCRA compliance requirements include DWMU inspections, personnel training, and emergency preparedness.

## ATTACHMENT

Further description of future needs, capacity, and the measures to prevent threats to human health and the environment are provided below.

### T-Plant DWMUs

**Anticipated Receipt of Additional Dangerous or Mixed Waste:** Present plans are for the T-Plant DWMUs included in this request to be used in the future for dangerous waste and mixed waste management activities in support of Hanford Federal Facility Agreement and Consent Order Action Plan (Tri-Party Agreement) Action Plan Milestone M-091 and other Hanford Site cleanup actions including 105-K Fuel Storage Basins sludge treatment. These waste management activities are dynamic in nature and schedules are driven by federal budget allocations. Future waste management campaigns include venting and repackaging of transuranic mixed waste stored in drums to meet off-site disposal requirements, such as the Waste Isolation Pilot Plant. Wastes to be managed include low-level waste, mixed low-level waste, transuranic waste, mixed transuranic waste, hazardous/dangerous waste and Toxic Substance Control Act polychlorinated biphenyl waste. Closure of these units would be incompatible with the necessary continued operation of the T Plant OUG.

**Capacity to Receive Additional Waste:** The T-Plant OUG is permitted under interim status and has process and design capacity for container storage and treatment. The storage design capacity for the DWMUs is shown in the following table:

**Treatment and Storage Capacity for T-Plant DWMUs**

DWMU	Treatment Capacity (Metric Tons/Day)	Storage Capacity (Liters)
221-T Canyon Deck	354.4 T04 90 T94	5,108,480
221-T Head End	0	8,320
221-T Operations Gallery Storage	0	114
221-BY Storage Area	0	591,168
2706-T Building	45.4	208,000 S01 13,191,000 X99
243-T Covered Storage Pad	0	591,168
214-T Building	354.4 T04	67,392
211-T Cage	0	19,968

Volumes are from Part A Permit Application submitted Oct 11, 2013

Currently, no dangerous or mixed waste is being stored in these DWMUs. Consequently, the capacity is sufficient for management of additional dangerous or mixed waste.

**Steps to Prevent Threats to Human Health and the Environment:** For these DWMUs, RL and CHPRC have and will continue to take steps to prevent threats to human health and the environment, including compliance with all applicable interim status requirements. The design and operating procedures for these DWMUs allows for the storage and treatment operations to meet RCRA interim status standards. These RCRA compliance requirements include DWMU inspections, personnel training, and emergency preparedness.

### CWC-WRAP DWMUs

**Anticipated Receipt of Additional Dangerous or Mixed Waste:** As describe in the current RCRA Part A Permit for this unit, the CWC-WRAP DWMUs included in this request are expected to be needed in the future for dangerous and mixed waste activities in support of Tri-Party Agreement Action Plan Milestone M-091 and other Hanford Site cleanup actions including retrieval activities at the 618-10 and 618-11 Burial Grounds. These waste management activities are dynamic in nature and schedules are driven by federal budget allocations. Future campaigns for these DWMUs will include storage and treatment of mixed low level waste (MLLW) and transuranic mixed waste (TRUM). Closure of this unit would be incompatible with the necessary continued operation of the CWC-WRAP OUG.

**Capacity to Receive Additional Waste:** The CWC-WRAP OUG is permitted under interim status and has process and design capacity for container storage and treatment. The storage design capacity for the DWMUs is shown in the following table:

**Treatment and Storage Capacity for CWC-WRAP DWMUs**

<b>DWMU</b>	<b>Treatment Capacity (Metric Tons/Day)</b>	<b>Storage Capacity (Liters)</b>
2402-W Waste Storage Building	0	334,500
2402-WC Waste Storage Building	0	334,500
2402-WD Waste Storage Building	0	334,500
2336-W Building - Shipping and Receiving Area	0	129,000
2404-WB Waste Storage Building	0	334,500
HERTR and Super HENC Waste Outdoor Storage Area	0	20,000

Volumes are from Part A Permit Application submitted Oct 11, 2013, with the exception of the HERTR and Super HENC Waste Outdoor Storage Area. The HERTR and Super HENC Waste Outdoor Storage Area storage capacity is estimated based on a unit with similar dimensions (the 211-T Cage).

Currently, no dangerous or mixed waste is being stored in these DWMUs. Consequently, the capacity is sufficient for management of additional dangerous or mixed waste.

**Steps to Prevent Threats to Human Health and the Environment:** For these DWMUs, RL and CHPRC have and will continue to take steps to prevent threats to human health and the environment, including compliance with all applicable interim status requirements. The design and operating procedures for these DWMUs allows for the storage and treatment operations to meet RCRA interim status standards. These RCRA compliance requirements include DWMU inspections, personnel training, and emergency preparedness.