Hanford Facility RCRA Permit Modification Notification Form

Part V, CLOSURE UNIT GROUP 39, 2401-W WASTE STORAGE BUILDING

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3 of 3 Revision Instructions

Submitted by Co-Operator:

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Hanford Facility RCRA Permit Modification Form	
Unit:	Permit Part
2401-W Waste Storage Building	***Part V, Closure Unit Group 39, Addendum H***

Description of Modification:

Due to resource availability closing the 2401-W Waste Storage Building cannot be completed within 180 days. It is necessary to extend the closure schedule one year beyond that which is currently identified in Addendum H Closure Plan, Section H.6 Closure Schedule and Time Frame.

In Section H.6, update the closure timeline to be extended one year from March 14, 2026, to March 14, 2027.

In accordance Addendum H Section H.6, Attachment 1 demonstrates how the permittees are complying with applicable requirements and taking steps to prevent threats to human health and environment at the 2401-W Waste Storage Building Dangerous Waste Management Unit. See Attachment 1, "Demonstration of Continued Compliance for the 2401-W Waste Storage Building".

WAC 173-303-830 Modification Class	Class 1	Class '1	Class 2	Class 3
Please mark the Modification Class:		X		

Enter relevant WAC 173-303-830, Appendix I Modification citation number:

D.1 Changes to the closure plan: b. Changes in the closure schedule for any unit, changes in the final closure schedule for the facility, or extension of the closure period, with prior approval of the director.

Modification Approved: ☒ Yes ☐ No

Reviewed by Ecology:

2026.02.03 10:09:39 -08'00'

E. J. Holbrook

Date

Revision Instructions:

Revise 2401-W Waste Storage Building Closure Plan to incorporate the changes shown herein.

- Observe and/or review soil sampling activities.
- Review sampling procedures and results.
- Observe and/or review contaminated environmental media removal (as applicable).
- Observe and/or review newly generated waste management and disposition records.
- Verify that closure activities were performed in accordance with this closure plan.

The IQRPE will record observations and reviews in a written report that will be retained in the operating record. The resulting report will be used to develop the clean closure certification, which will then be submitted to Ecology.

H.5.3 Closure Certification

Within 60 days of completion of closure of the 2401-W Building DWMU, a certification that the DWMU has been closed in accordance with the specifications in this closure plan will be submitted to Ecology by registered mail or other means that establish proof of receipt (including applicable electronic means). The certification will be signed by the Permittees and by the IQRPE.

At the time of the closure certification submittal, the Permittees will submit to Ecology information to support the closure certification. [WAC 173-303-610(6)]

The supporting information will include at least the following:

- All field notes and photographs related to closure activities.
- A description of any minor deviations from this closure plan and justification for these deviations.
- Documentation of the removal and final disposition of any unanticipated contaminated environmental media.
- Documentation of the removal and final disposition of any newly generated waste.
- All laboratory and/or field data, including sampling procedures, sampling locations, QA/QC samples, and COC procedures for all samples and measurements, including samples and measurements taken to determine background conditions and determine or confirm clean closure.
- A summary report that identifies and describes the data reviewed by the IQRPE, and tabulation of the analytical results of samples taken to determine and confirm clean closure performance standards were met.
- Description of the 2401-W Building DWMU appearance at completion of closure, including what parts of the former unit, if any, will remain after closure.

H.6 CLOSURE SCHEDULE AND TIME FRAME

Closure activities will take longer to complete[1] than 180 days after the effective date of the approved permit modification incorporating this closure plan. The permit modification request to extend completion of closure has set the revised date of closure completion by March 14, ~~2026~~2027. This request also had the required information on steps to be taken to prevent threats to human health and the environment. [WAC 173-303-610(4)(b)]

[1]The closure timeline was extended from March 14, 2024, to March 14, 2025, through approval of Class [1]1 Permit Modification PCN-2401WWSB-2024-01~~. The closure timeline is~~ was extended again from March 14, 2025, to March 14, 2026, through approval of Class [1]1 Permit Modification PCN-2401WWSB-2025-01. The closure timeline is extended from March 14, 2026, to March 14, 2027, through approval of Class [1]1 Permit Modification PCN-2401WWSB-2025-02. The permit modification incorporating this closure plan was issued on August 17, 2023 (8C.2023.3F). The original date for closure activity completion was March 14, 2024.

Should an unexpected event occur and an extension to the revised closure activity expiration date be deemed necessary, a permit modification request will be submitted to Ecology for approval at least 30 days prior to the March 14, ~~2026~~ 2027 expiration date. [WAC 173-303-610(4)(c)]

The permit modification request will include the statement that closure activities, will of necessity, take longer than the March 14, ~~2026~~ 2027 to complete, and the supporting basis for the statement. The permit modification request will also include necessary information demonstrating that all steps to prevent threats to HHE have been and will continue to be taken, including compliance with all applicable permit requirements. [WAC 173-303-610(4)(b)]

The closure certification will be submitted to Ecology within 60 days following completion of closure activities at the 2401-W Building DWMU (Table H-8 and Figure H-8).

Table H-8 2401-W Waste Storage Building Dangerous Waste Management Unit Closure Schedule

Closure Activity Description		
Activity	**Description**	**Duration**
Closure Activities		
Remove All Waste	Package and ship dangerous or mixed waste to a RCRA permitted facility for treatment, storage, or disposal.	Completed (Section H.3.1)
Records Review	Perform review of 2401-W Building container storage, operating, and inspection records.	Completed (Section H.3.2)
Perform Initial Visual Inspection of 2401-W Waste Storage Building	Inspect floor surface for dangerous and mixed waste-related staining.	Completed (Section H.3.2 & Attachment A)
	Inspect for visible holes, cracks, crevices, pits, or other breaches in structural integrity Identify focused sampling locations (as applicable).	
Remove Equipment and perform Final Visual Inspection of 2401-W Waste Storage Building	Remove equipment and material from the 2401-W Building and perform a final visual inspection of the floor surface (Section H.3.4).	20 Days
Decontaminate Floor Surface	Decontaminate 2401-W Building floor surface (Section H.3.5) to meet clean debris surface standard (Section H.5.1.1).	150 Days
Confirm Clean Debris Surface	After decontamination, visually inspect floors to verify that clean debris surface standard has been met. (Section H.5.1.1)	10 Days
Address Soil Beneath 2401-W Waste Storage Building	Perform focused sampling and analysis in accordance with SAP (Section H.4).	70 Days
	Perform data verification/validation and data quality assessment (Section H.4.5).	
	If necessary, remove contaminated environmental media (Section H.4.4.3).	

Demonstration of Continued Compliance for the 2401-W Waste Storage Building

The Permittee is demonstrating compliance with final status requirements in accordance with Site-wide Permit Condition I.A. Facility personnel manage the dangerous waste management unit (DWMU) according to security requirements, inspection requirements, training requirements, and contingency and emergency requirements, as outlined below. This information demonstrates steps that the Department of Energy, Hanford Field Office (DOE-HFO) has taken and will continue to take to prevent threats to human health and the environment.

WAC 173-303-310 Security

Warning signs are posted stating "Danger-Unauthorized Personnel Keep Out" (or an equivalent legend) at the facility. The signs have a font type and size written in English that ensures that it can be read from a distance of at least 25 feet. Requirements for a 24-hr surveillance (WAC 173-303-310(2)(b)) and an artificial or natural barrier system (WAC 173-303-310(2)(c)) are met at the Hanford Facility level as identified in Attachment 3, "Security" to the WA7890008967, Hanford Facility Resource Conservation and Recovery Act Permit. Visitors are required to sign in and are subject to escorting protocols. Entry gates at points in the perimeter fence are either locked or, when open for operations. Gate keys are controlled and accessible by authorized personnel only (WAC 173-303-310(2)(c)).

WAC 173-303-320 General inspection

Requirement	Frequency	Inspection Description
Signage	Annually	Warning signs are present and clearly legible.
Site - General	Annually	There is no evidence that unusual conditions exist at the DWMU site.

WAC 173-303-330 Personnel Training

The Dangerous Waste Training Plan meets the requirements of WAC 173-303-330 and contains the following:

- For each position related to the dangerous waste management of the facility, the job title, job description, and the name of the employee filling each job.
- A written description of the type and amount of both introductory and continuing training required for each position.
- Records documenting facility personnel have received and completed the training required by this section.

Introductory and continuing training programs are designed to prepare personnel to manage and maintain the facilities in a safe, effective, and environmentally sound manner. In addition to preparing personnel to manage and maintain the facilities under normal conditions, the training programs ensure that personnel are prepared to respond in a prompt and effective manner should abnormal or emergency conditions occur.

WAC 173-303-350 Contingency plan and emergency procedures

WAC 173-303-360 Emergencies

The Building Emergency Plan describes both the facility hazards and the basic responses to upset and emergency conditions within the facility. These events may include spills or releases caused by processing, fires, explosions, transportation activities, movement of materials, packaging, storage of hazardous materials, or natural and security contingencies. When used in conjunction with Permit Attachment 4, Hanford Emergency Management Plan, the plans meet the requirements for contingency planning as required by WAC 173-303.

The Building Emergency Plan covers the following:

- Building emergency response organization
- Plan implementation
- Facility hazards (hazardous waste, dangerous waste, industrial hazards, radioactive materials, criticality)
- Potential emergency conditions (facility operations emergencies, natural phenomena, security contingencies, unexpected/unidentified odors)
- Incident response (protective action, emergencies, prevention of recurrence, natural phenomena, security)
- Termination of event, incident recovery and restart of operations
- Emergency equipment
- Coordination agreements
- Required reports
- Plan location and amendments
- Facility/building emergency response organization