Hanford Facility RCRA Permit Modification Notification Form

Part V, Closure Unit 41
221-T Railroad Cut

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Submitted by Co-Operator:

ROBERT BULLOCK (Affiliate)

Digitally signed by ROBERT BULLOCK (Affiliate)
Date: 2026.01.27 07:03:32 -08'00'

Robert E. Bullock

Reviewed by DOE Program Office:

DUANE CARTER

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Duane Carter

Hanford Facility RCRA Permit Modification Form	
Unit:	Permit Part
221-T Railroad Cut	***Part V, Closure Unit Group 41, Addendum H***

Description of Modification:

Due to areas identified during the data validation process requiring further evaluation, it is necessary to extend the closure schedule for the 221-T Railroad Cut beyond the 180 days 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 221-T Railroad Cut Dangerous Waste Management Unit. See Attachment 1, "Demonstration of Continued Compliance for the 221-T Railroad Cut".

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 10:07:14 -08'00'

E. J. Holbrook

Date

Revision Instructions:

Revise the 221-T Railroad Cut Closure Plan to incorporate the changes shown herein.

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 221-T Railroad Cut 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[3] 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)]

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 221-T Railroad Cut DWMU (Table H-8 and Figure H-6).

[3] The closure timeline was extended from March 14, 2024, to March 14, 2025, through approval of Class 1 Permit Modification PCN-221TRC-2024-01 and was ~~. The closure timeline is~~ extended again from March 14, 2025, to March 14, 2026, through approval of Class 1 Permit Modification PCN-221TRC-2025-01. The closure timeline is extended from March 14, 2026, to March 14, 2027, through approval of Class 1 Permit Modification PCN-221TRC-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.

Demonstration of Continued Compliance for the 221-T Railroad Cut

The Permittee is demonstrating compliance with final status requirements in accordance with Site-wide Permit Condition I.A. T Plant personnel manage the 221-T Railroad Cut 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 entry gate of the T Plant Complex. Identical signs are posted along the perimeter fence lines at distances not to exceed 250 ft (76.2 m) between signs.

Access to the DWMU is controlled by an approximate 2.4 m (8 ft) high chain-link fence. A two-part swinging chain link gate at the T Plant main entrance is open during operational hours to allow vehicle and personnel ingress to the parking lot and outdoor areas. This gate is closed and locked when personnel are away from T Plant. Alternate vehicle access gates, found about the fenced perimeter, are closed and locked except when in use. Keys to gates are controlled and accessible only by authorized personnel. [WAC 173-303-310(2)(c)]. Upon arrival at T Plant, visitors are required to sign in at the 271-T Building administration office, and must adhere to all personal protection requirements, and are subject to escorting protocols.

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.

WAC 173-303-320 General inspection

Inspection Requirements for the 221-T Railroad Cut

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 for T Plant meet 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 for T Plant 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