

**2/10/14: Preliminary issue manager discussion draft (Vanni); path forward TBD**  
**RCRA Permit modifications**

RE: Class 3 Modifications to the Hanford Site RCRA Permit for the Low-Level Burial Grounds Trenches 31, 34 and 94, the Central Waste Complex and Waste Receiving and Processing Facility (CWC-WRAP) and the T-Plant Complex (T-Plant).

These modifications to the Hanford RCRA Permit Rev. 8C are in part the result of actions required by the Consent Agreement and Final Order (CAFO-No. RCRA-10-2013-0113) executed by the U.S. Department of Energy (DOE) and the U.S. Environmental Protection Agency (EPA) dated June 26, 2013 wherein DOE was charged with conducting storage of RCRA regulated dangerous waste in the units listed below without a permit or interim status in violation of Section 3005 of RCRA, 42 U.S.C. § 6925, WAC 173-303-800, and Condition I.A. of the Hanford Facility RCRA Permit.

These units are as follows:

- T-Plant 271 T cage
- T-Plant 211 T pad
- T-Plant 221 T sand filter pad
- T-Plant 221 T - R5 waste storage area
- T-Plant 277 T outdoor storage area
- Central Waste Complex ("CWC") outside storage A
- CWC outside storage area B
- Lower Level Burial Grounds ("LLBG"), FS 1, south of Trench 34, outdoor container storage area.

DOE was charged with failure to submit Closure Notice and Closure Plans for units subject to interim status closure requirements at 40 C.F.R. Part 265, Subpart G, as specified at WAC 173-303-400(3) for the 221-T Plant Railroad Tunnel TSD unit and Building 2401 W at CWC.

Additionally, DOE was charged with failure to comply with Land Disposal Restriction requirements in violation of 40 C.F.R. § 268.45, which is incorporated into WAC 173-303-140(2)(a) by reference with the 12/17/2010 disposal of 52 mixed dangerous waste/low-level waste (MLLW) high-temperature gas reactor (HGTR) drums in Trench 34, and subsequent 3/3/2011 disposal of eight (8) (MLLW) high-temperature gas reactor boxes and two (2) MLLW drums in Trench 34 without first satisfying applicable treatment standards.

DOE submitted closure plans for the units listed in the CAFO and CWC Building 2401W on October 11, 2013 [13-ESQ-0074]. DOE subsequently identified five additional DWMUs at the T-Plant Complex which no longer had a future use and submitted closure plans ON October 18, 2013 [14-ESQ-0003] for the following:

- 277-T Building
- 2706-TB Tank System
- 221-T Railroad Cut
- 221-T Pipe Gallery Storage
- 221-T Tank System

The proposed modifications also included the submittal of Part A forms and Inspection and Personnel Training Plans.

DOE requested from Ecology and was granted an extension for the submittal of a closure plan for the 221-T Railroad Tunnel and the CWC- WRAP units 2336W Building - Shipping and Receiving Area; 2336-W Building NDE/NDA Area; 2336-W Building Process Area; 2336-W Building Room 152; 2404-WB Building; 2404-WC Building [letters 13-AMRP-0311 & 13-NWP-108].

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Ecology noted the 221 -T Railroad Tunnel and the WRAP facility are currently shut down due to budget constraints. Not having received dangerous waste in more than a year, they are candidates for closure. However, DOE has determined these dangerous waste management units will be needed for future Hanford Site waste management activities. Based on the submitted information, Ecology granted an extension to September 30, 2014, for beginning closure of the 221-T Railroad Tunnel and the CWC-WRAP Facility. Any approval of an extension request is contingent upon information to be provided along with a permit modification request. The permit modification request will include Part A forms and Part B permit application information for all the SWOC units. Information to be provided includes:

- More detailed descriptions of the waste management activities to be conducted in these units and the types of wastes to be managed.
- Demonstration of the capacity to receive additional waste as it relates to planned future operations.
- Continued measures to prevent threats to human health and the environment.

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