

TPA M-045 series change package Waste Management Area C (WMA C)

John Price

Tri-Party Agreement Section Manager,
Nuclear Waste Program



What is M-45?

What's being changed?

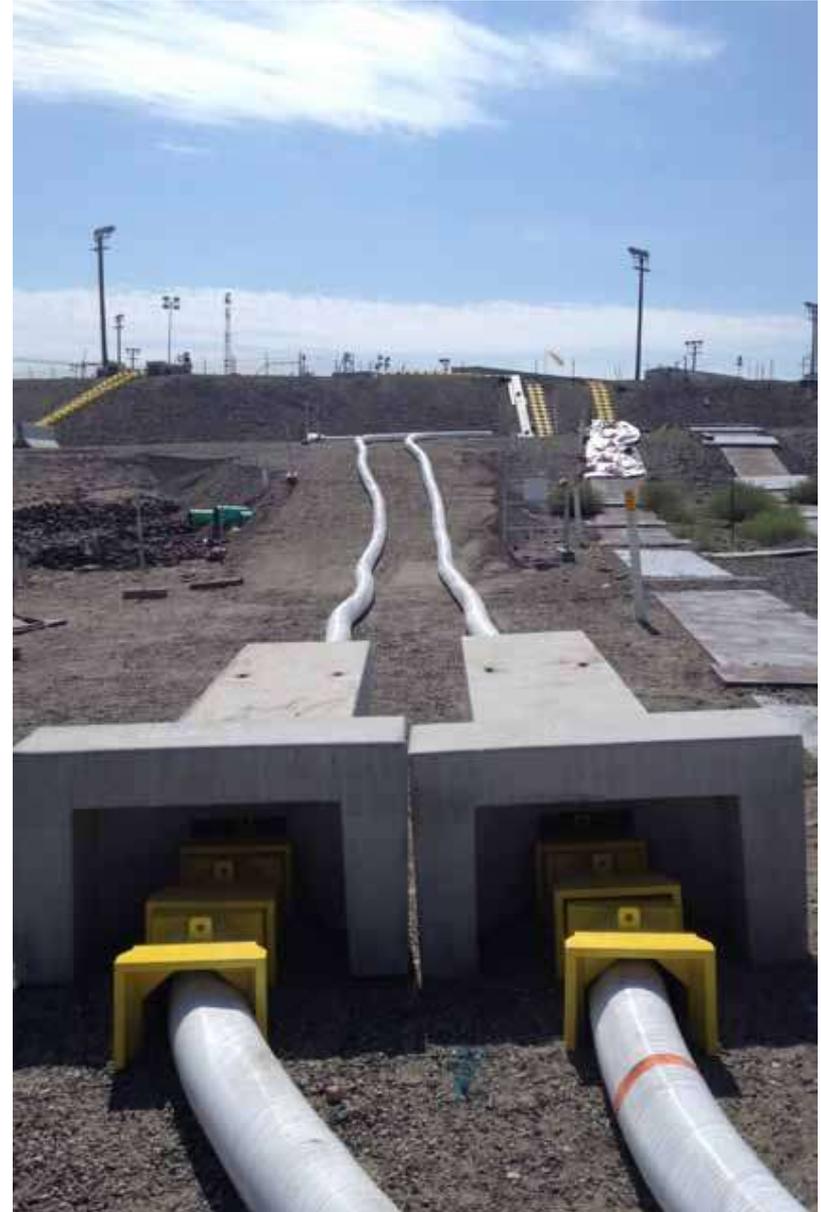
- M-45 milestones are schedules to “Complete the closure of all Single Shell Tank (SST) Farms”
- Proposed changes are dates for steps towards closure of 16 tanks in C Tank Farm



Aerial of C Farm, April 2015.

What are the steps toward closure?

- Investigate soil contamination (WMA C PA)
- Retrieve waste from tanks
- Closure plan(s)
 - Public comment
- Closure per approved plan



Waste transfer lines

What is a closure plan?

- Ecology regulations require a “closure plan” for each *unit* that manages (treats, stores or disposes of) dangerous waste (or mixed radioactive/dangerous waste)
 - Each single-shell tank is a unit that must be closed
- Closure plans describe detailed steps to remove or decontaminate all dangerous waste residues and contaminated containment system components, equipment, structures, and soils
 - There are 16 tanks in WMA C
 - There is contaminated soil & equipment



Clean Closure/Landfill Closure

- **Clean Closure** - Rules that apply if a tank and associated pipes, pumps, and so forth can be removed completely from the ground or cleaned to a protective level.
- **Landfill Closure** - Rules that apply if the tank, piping, and associated equipment are left in place and will require post-closure care, such as ongoing monitoring, maintenance, or institutional controls.

Tank Closure101: *Understanding Tank Closure Standards at Hanford*

<https://fortress.wa.gov/ecy/publications/documents/0805017.pdf>



SST System (149 tanks) closure divided into Tier 1, 2, 3 plans

- **Tier 1 Closure Plan** – The plan to close the SST system of 149 tanks, associated piping and equipment, contaminated soil and contaminated groundwater.
- **Tier 2 Closure Plan** – A plan to close an individual Waste Management Area. (Example: C Farm is one WMA)
- **Tier 3 Closure Plan** – A plan to close an individual tank within a WMA. Contaminated soil around the tank would also have a closure plan.



Why change dates for C Tank Farm closure steps?

- M-45-82 required ORP to submit Tier 1, 2, 3 plans for WMA C on 09/30/2015
 - ORP submitted Tier 1, not Tier 2 or 3
 - A replacement date is needed for Tier 2, 3
- M-45-83 required WMA C closed 6/30/2019
 - Tier 2, 3 had to be approved in 2013
 - Amended consent decree milestone B-1 allows ORP to finish retrieving last C tank by 3/31/2024
- ORP wants a phased approach



What is the phased approach?

- Phasing allows lessons learned from one closure to be applied to the next
- The 4 smallest C Farm tanks (C-201-204) were selected as the first SSTs to be closed



Retrieval has been completed for all C Farm tanks except C-105.

TPA changes add expectations for schedule in WMA C Tier 2 plan

- Dates to submit Tier 3 closure plans for larger C-100 tanks
- Date to submit Tier 3 closure plans for contaminated soil
 - C-200 tanks: Tier 3 plans will include schedules for closure activities
- Target dates to start Tier 3 closure activities
- Date to complete WMA C closure (replaces M-45-83 date 6/30/2019)



How do dates change for closure plans?

- ORP will submit the Tier 2 for WMA C by 3/31/2017 (old 9/30/2015)
- ORP will submit the first four Tier 3 plans for smaller C-200 tanks by 3/31/2017 (old 9/30/2015)
- Ecology will review the Tier 2 and Tier 3 plans
 - ORP will revise the plans based on Ecology comments
 - ORP will ask for public comment and hold a public meeting on the plans
 - Ecology will hold a separate public comment on the plans as revised after the ORP public comment period
 - Ecology will modify the Hanford permit to incorporate the closure plans as modified



What is the schedule for review and approval of this change package?

- 45-day public comment period tentatively set to run from January 30 - March 17, 2017
- Ecology and ORP will also discuss the changes with tribal governments if requested
- Ecology and ORP will review the public comments
 - Change package may be revised based on public comments or discussions with tribal governments
 - A “responsiveness summary” will be published for all comments received
 - Agencies will sign the change package as revised after public comment period





Questions and Discussion