Hanford Dangerous Waste Permit

Class 3 Modification Update

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August 7, 2014
Terms to Know

**SWOC**
Solid Waste Operations Complex, which includes:
  - CWC-WRAP (Central Waste Complex and Waste Receiving and Processing Facility)
  - T-Plant
  - Low-Level Burial Grounds (LLBG) which includes Trenches 31 and 34, and Trench 94

**CAFO**
Consent Agreement and Final Order

**Agreed Order**
Ecology’s enforcement action
About the 2013 SWOC Enforcement Actions

EPA

CAFO – Submit permit mods for inactive units

Ecology

Agreed Order - Bring the rest of the SWOC units into Hanford’s current permit

Now!

Next!
Scope of SWOC Comment Period

• Close the units called for in CAFO:
  • **LLBG:** FS-1 Outdoor Storage Area
  • **CWC/WRAP:** Outdoor Storage Area A, Outdoor Storage Area B, and 2401-W Waste Storage Building
  • **T-Plant:** 271-T Cage, 211-T Pad, 221-T Sand Filter Pad, 221-T R5 Waste Storage Area, and 277-T Outdoor Storage Area

• Plus a few more:
  • **T-Plant:** 277-T Building, 2706-TB Tank System, 221-T Railroad Cut, 221-T Pipe Gallery Storage, and 221-T Tank System

14 units to be closed
Central Waste Complex Closing Areas

Outside Storage Areas A&B and 2401-W
Two T-Plant Closing Units (Under CAFO)

211-T Pad

211-T Sand Filter Pad
Two Closing T-Plant Units (USDOE Proposed)

211-T Railroad Cut

277-T Building
Status

• Comment period October 30, 2013 – January 6, 2014
  • USDOE conducted
  • Comment period scope: modification request
• Ecology taking very critical look:
  • Schedule for closure
  • Plans based on record review, not sampling
  • Many details of closure activities missing since they are assumed clean
Next Comment Periods

- Ecology to issue draft permit to close units
  - In about 5 months (work is underway)
  - Comment period: TBD. *(Minimum: 45 days)*

  **THEN,**

- Next Class 3 mod will satisfy Ecology’s enforcement, because it will bring rest of the SWOC units into final permit
SWOC Class 3 Permit Mods Overview

Close few units (for CAFO)
USDOE’s comment period on the request 10/30/13 – 1/6/14, public meeting

We are HERE

Bring all of SWOC into current permit (for Ecology’s Agreed Order)
USDOE’s comment period on request 60 days, public meeting - TBD

Close few units (for CAFO)
Ecology’s comment period on draft permit (45 days)
Units will enter permit for future closure

Bring all of SWOC into current permit (for Ecology’s Agreed Order)
Ecology’s comment period on draft permit (45 days) TBD
All SWOC units will have a permit!