



Changes Proposed to Cleanup, Closure Schedule for Hanford C Farm Tanks

The U.S. Department of Energy Office of River Protection (DOE-ORP), Washington Department of Ecology (Ecology) and U.S. Environmental Protection Agency (EPA) – the Tri-Party Agreement (TPA) agencies – are proposing changes to the TPA. These proposed changes affect the schedule for completing cleanup work in Hanford's C Tank Farm. The agencies want your input on these proposed milestone changes before they are finalized.

U.S. Department of Energy • Washington State Department of Ecology • U.S. Environmental Protection Agency

Background

The Hanford Site is located in southeastern Washington state along the Columbia River. The 580-square-mile site was created in 1943 as part of the Manhattan Project to produce plutonium for the nation's defense program. Today, waste management and environmental cleanup are the main missions at Hanford.

The *Hanford Federal Facility Agreement and Consent Order* (also known as the Tri-Party Agreement or TPA) is a legal agreement between DOE, Ecology and EPA that identifies cleanup actions and schedules, called milestones. The TPA agencies are proposing changes to milestones that affect the schedule for cleanup work in Hanford's C Tank Farm. To learn more about Hanford tanks visit: <http://www.hanford.gov/page.cfm/TankFarms>.

The TPA agencies want your input on these proposed changes. You can provide input during the public comment period that runs from **January 23 through March 10, 2017**.

What changes are proposed?

The Tentative Agreement on page 3 relates to milestones that guide closure activities and set requirements for the first closure of a Hanford single-shell tank (SST) Waste Management Area (WMA), WMA-C. The individual milestones involved include M-045-82, M-045-83 and M-045-62, as well as a new proposed milestone, M-045-82A.

Frequently Asked Questions



What is a TPA Milestone?

A TPA milestone is a legal agreement between DOE, Ecology and EPA that identifies cleanup actions and schedules.

How do milestones affect work at Hanford?

Milestones set the pace for completing cleanup work. They also set priorities for which work is completed first.

How do milestones affect budget?

DOE must request a budget to finish milestones due in any given year. Having milestones in place identifies how much money is needed to complete work at Hanford each year.

Why are the TPA agencies proposing changing milestones?

The agencies change milestones when new work is identified, the scope or amount of work in an existing milestone is changed, or to reset a milestone that has been or will be missed.

Public Comment

The Tri-Party Agreement agencies want your feedback on the proposed TPA changes. The public comment period runs from **January 23 through March 10, 2017**.



What is the Basis for Proposing these Changes?

M-045-82: In September 2015, DOE-ORP submitted to Ecology a Tier 1 closure plan for all 149 SSTs, but did not submit the Tier 2 and Tier 3 closure plans as required by this milestone. This change resets the date for submitting those Tier 2 and 3 plans.

M-045-82A: DOE is proposing to phase submittal of Tier 3 closure plans for the 16 tanks in WMA-C over time, so that the agency can apply lessons learned from preparing the first four closure plans (for the small C-200 tanks) to the other 12 closure plans (for the larger C-100 tanks). The parties created a new milestone to set a date for those first four plans.

M-045-62 and M-045-83: Schedules for closure activities are normally included in closure plans. Those schedules become enforceable once the closure plans are added to a permit.

If closure schedules were included in both the TPA and in closure plans within the permit, those schedules could be duplicative or could conflict (have different dates for the same activity). To avoid duplication or conflict, the due dates in the existing M-045-62 and M-045-83 milestones have been adjusted to reference the closure plan schedules.

How Will This Affect Work in the Tank Farms?

This proposed change establishes an incremental approach to tank closure that:

1. Allows lessons learned from one closure to be applied to the planning of the next closure.
2. Demonstrates progress toward WMA-C closure in a way that promotes momentum for remaining WMA-C goals.

The C-200 tanks were selected as the first single-shell tanks to be closed based on:

1. Ease of access (the tanks are located at the farm edge, and access from outside the farm would be possible for closure activities);
2. The tanks are prime candidates for the first demonstration of the closure approach.
3. Reduced obstructions and a decreased amount of closure equipment required to be located within the farm.

The closure of additional components within WMA-C would follow in the sequence as additional closure decisions are made, lessons learned are incorporated and closure designs are developed.

Terms and Definitions

- **Dangerous Waste Management Unit (DWMU)** – A unit used for treatment, storage, or disposal of dangerous waste. Single-shell tanks (SSTs) and their piping are DWMUs.
- **Closure Plan** – Each DWMU must have a written closure plan for removing or decontaminating equipment, bases, liners or soils contaminated with dangerous wastes.
- **RCRA** – The Resource Conservation and Recovery Act is a federal law enacted in 1976 that regulates the generation, transportation, treatment, storage and disposal of hazardous wastes. Ecology is authorized by EPA to regulate Hanford cleanup under RCRA.
- **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** – The plan to close an individual Waste Management Area (WMA).
- **Tier 3 Closure Plan** – The plan to close an individual tank within a WMA. Contaminated soil around the tank would also have a closure plan.
- **Waste Management Area** – The 149 SSTs are grouped into seven WMAs for regulatory purposes.

How You Can Get Involved!

The public comment period on *proposed changes to the TPA M-045 milestone series* runs from **January 23 through March 10, 2017**. The TPA agencies would like your feedback on these proposed changes. Full versions of the TPA change packages documenting the proposed changes are available at www.hanford.gov and at <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0073639H> www.hanford.gov.

For more information please contact Dieter Bohrmann, DOE-ORP, 509-376-9292.

Please submit comments by March 10, 2017 to:

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Office of River Protection
PO Box 450, MS H6-60
Richland, WA 99352
Email (preferred): TPA@RL.gov



Proposed Changes to the Agreement:

Modifications to Tri-Party Agreement text is displayed as double underline to indicate added text and ~~strikeout~~ to indicate deleted text.

<p>M-045-82</p> <p>Lead Agency:</p> <p>Ecology</p>	<p>Submit complete permit modification requests for Tiers 1, 2, & 3 (see Appendix I) of the SST System, to support final closure requirements for WMA C.</p> <p><u>Submit to Ecology for review, in accordance with HFFACO Action Section 9.2.2, the draft Tier 2 closure plan for WMA C. The Tier 2 plan shall include a proposed TPA milestone change control form identifying all Tier 3 submittal dates for WMA C, and proposed target dates to initiate Tier 3 closure activities. Target dates will be converted to enforceable schedules through permit modification to incorporate Tier 3 closure plans.</u></p>	<p>9/30/2015</p> <p><u>3/31/2017</u></p>
<p><u>M-045-82A</u></p> <p><u>Lead Agency:</u></p> <p><u>Ecology</u></p>	<p><u>Submit to Ecology for review, in accordance with HFFACO Action Section 9.2.2, the draft Tier 3 closure plans for the C-200 tanks (C-201, C-202, C-203, and C-204) including schedules.</u></p>	<p><u>3/31/2017</u></p>
<p>M-045-62</p> <p><u>Lead Agency:</u></p> <p><u>Ecology</u></p>	<p>Submit to Ecology for review, <u>in accordance with HFFACO Action Section 9.2.2, the draft Tier 3 closure plan to implement corrective measures identified in the approved and approval as an Agreement primary document a Phase 2 Corrective Measures Implementation Work Plan (CMIP) for WMA C.</u></p>	<p>Six (6) months after the approval of the CMS submitted under milestone M-045-61A.</p> <p><u>To Be Established in accordance with the date identified in the M-045-82 Tier 2 closure plan</u></p>
<p>M-045-83</p> <p>Lead Agency:</p> <p>Ecology</p>	<p>Complete the Closure of WMA C: <u>by completing all closure activities specified in the Tier 2 closure plan, not including activities specifically described in the Tier 2 closure plan as requiring integration with closure of other WMAs.</u></p> <p>The milestone date assumes Ecology will issue a final permit modification decision within 12 months of receiving DOE's modification request under M-045-82. If Ecology does not issue a final permit modification decision within 12 months of receiving DOE's modification request under M-045-82, the milestone date will be extended on a day for a day basis for each day beyond the 12 month period until a final permit modification decision is issued.</p>	<p>06/30/2019</p> <p><u>To Be Established in accordance with the date identified in the M-045-82 Tier 2 closure plan</u></p>



OFFICE OF
RIVER PROTECTION
United States Department of Energy

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The documents are available for review at the Public Information Repositories listed below

HANFORD PUBLIC INFORMATION REPOSITORY LOCATIONS

Portland

Portland State University Library
Branford Price Millar Library
1875 SW Park Avenue
Portland, OR 97207
Attn: Claudia Weston (503) 725-4542

Richland

U.S. Department of Energy Public Reading Room
Washington State University, Tri-Cities
Consolidated Information Center, Room 101-L
2770 University Drive
Richland, WA 99352
Attn: Janice Scarano (509) 373-7443

Seattle

University of Washington
Suzzallo Library
4000 15th Avenue NE
Seattle, WA 98195
Attn: Hilary Reinert (206) 543-5597

Spokane

Gonzaga University
Foley Center Library
East 502 Boone Avenue
Spokane, WA 99258
Attn: John Spencer (509) 313-6110

Administrative Record and Public Information Repository

2440 Stevens Center Place, Room 1101, Richland, WA
509-376-2530; <http://pdw.hanford.gov/arpir/>