

Hanford Advisory Board – Agency Update
June 6, 2018
Alex Smith, Ecology

Outline

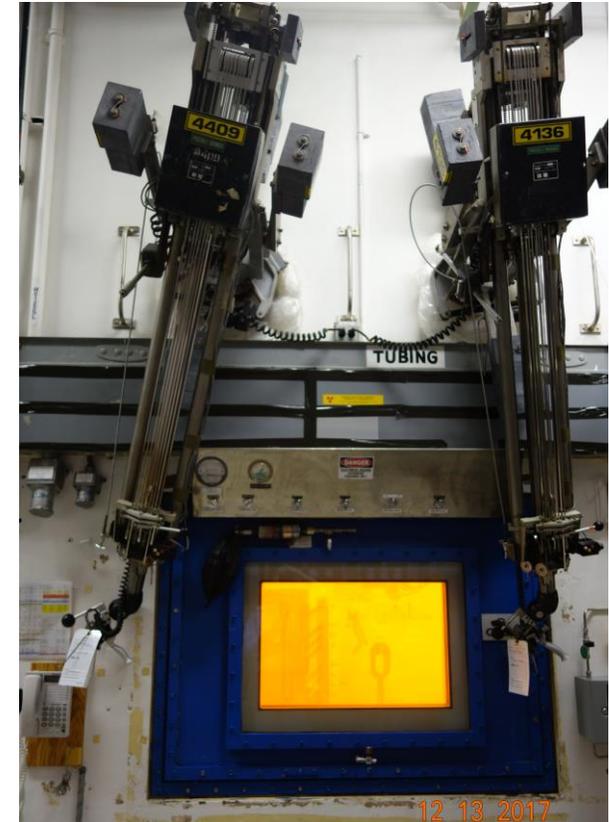
- Upcoming TPA Changes
- Permitting Update
- New Faces at Ecology



Public Comment Period

TPA M-92 milestones

- Store, treat/process, dispose of cesium and strontium capsules
- Convert bulk sodium for use in the Waste Treatment Plan
- Store and dispose of 300 Area Special Case Waste



WESF Hot Cell



M-92 Public Comment Period(s)

There will be three separate public comment periods related to storage of the cesium-strontium capsules:

- *Previous:* USDOE held a public comment period November 27, 2017, to January 31, 2018, for a Class 3 Permit Modification to the Hanford Dangerous Waste Permit. USDOE asked for comments on the construction and operation of a proposed Capsule Storage Area.
- *Current:* The TPA agencies are holding a public comment period May 21 – July 6 for changes to the TPA M-92 milestone. These changes relate to all 3 wastes (cesium and strontium, bulk sodium, and Special Case Waste).
- *Future:* Ecology will hold a future 60-day public comment period on the Class 3 Permit Modification to the Hanford Dangerous Waste Permit, for the proposed Capsule Storage Area.



System Plan Negotiations update

TPA M-62-45 milestone

- Ecology and DOE did not reach agreement by May 31 deadline
- We have extended the deadline to June 30
- When we reach agreement, we will provide
 - 30-day advance notice of public comment
 - 60 day public comment period
 - Opportunity for public meeting(s)

This means that the public comment period would extend beyond the date of the September Board meeting



Other TPA negotiations still in progress (We told you about these in March)

- Section 5.5 of the TPA Action Plan would add additional detail about RCRA-CERCLA integration
- M-91 milestone for Transuranic Waste Management

After negotiations conclude, agencies will provide pre-notice of public comment periods



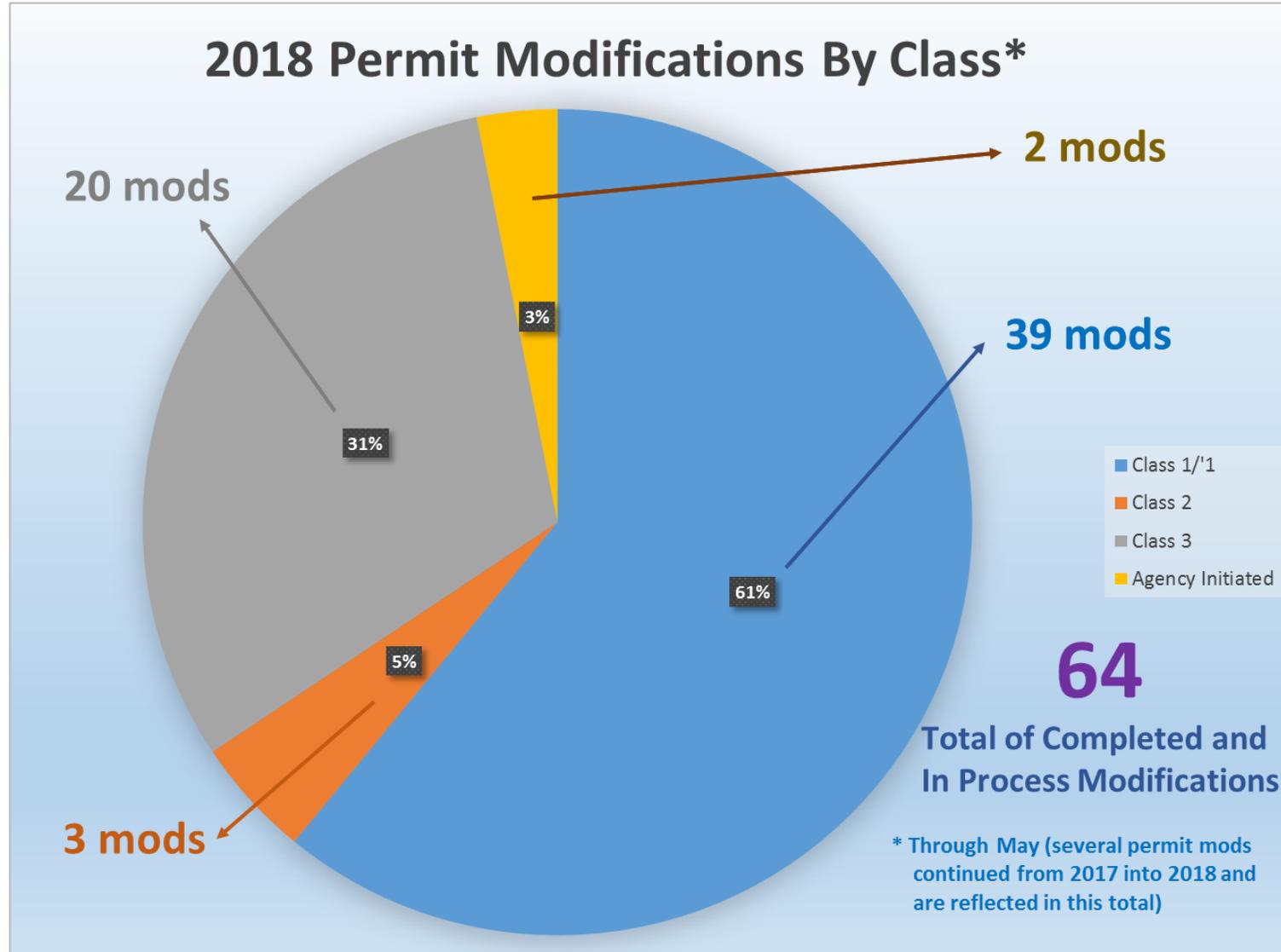
Milestone extensions (delays)

FFY2018 Lack of Appropriated Funds

- Omnibus appropriation (\$947MM) is less than compliance-level request (\$1,030 MM)
- TPA ¶149.G allows DOE to request milestone changes due to lack of appropriated funds
- DOE-RL told Ecology and EPA of proposed milestone changes
- Delays include milestones named in Board Advice #287 and Response



Permit Modifications – Rev. 8c



Permit Mod Forecast – Rev. 8c

As of May 2018

Unit	Class 2	Class 3	Agency initiated
WTP Part III		X	
WTP Analytical Laboratory		X	
PUREX Tunnels – Changes to Permit to Address Stabilization of Tunnels 1 and 2		X	
Capsule Interim Storage		X	
SWOC CWC: Outside Storage Area A, Outside Storage Area B, and D-10 Outside Storage Area		X	
SWOC T Plant: 277-T Building, 277-T Outdoor Storage Area, 211-T Pad, and 271-T Cage		X	
SWOC Part B - Operating Units		X	
276-BA (Tank ISO-East)		X	



Permit Mod Forecast – Rev. 8c Cont.

As of May 2018

Unit	Class 2	Class 3	Agency initiated
PUREX - Closure Plans for 203-A Acid Storage Area TK-P4 and 211-A Chemical Storage Area TK-40		X	
PUREX – Closure Plan for Tank 156 (TK-156)		X	
WESF Operating (support capsule movement to dry storage)		X	
Capsule Interim Storage		X	
324 Building – RCRA-CERCLA Coordinated Closure		X	



Permit Mod Forecast – Rev. 8c Cont.

As of May 2018

Unit	Class 2	Class 3	Agency initiated
Integrated Disposal Facility	X		
Attachment 10 – Purgewater Management Plan	X		
WTP Part III, Non-Critical Piping	X		
WTP Ancillary Equipment			X
LAW Environmental Performance Demonstration Testing (EPDT)			X



Rev. 9 Progress

- Completed Major Theme agreements with DOE on 6 of 11 permit addenda.
- Working on Unit Group workshops for 7 of 11 permit addenda.
- Completed most of the Part A and Security addenda.
- Ecology and DOE are now tracking their progress against the schedule that has been developed.

CAP Status

Reissue Rev. 9 Permit

<i>February 2018</i>	Completed CAP	Rolled-up Data	Presented to DOE	Major Themes Completed Workshops	Unit Group Workshops
Part A	✓	✓	✓	✓	Started unit group workshops with DOE
Security	✓	✓	✓	✓	Started unit group workshops
Closure	✓	✓	✓	✓	Starting unit group workshops.
Post-closure	✓	✓	✓	✓	Starting unit group workshops.
Groundwater	✓	✓	✓	✓	Started unit group workshops with DOE
Inspections	✓	✓	✓	✓	Finalizing instructions to start workshops.
Training	✓	✓	✓	Last workshop scheduled 2/6/18.	
Waste Analysis Plan	✓	In review.			
Process	Under Review – final draft stage.				
Preparedness & Prevention	✓	On hold pending arrival of BEP's			
Contingency/HEMP	First internal review complete. On hold pending HEMP document.			✓ Waiting on revised HEMP document.	



Reissue Rev. 9 Permit

Rev. 9 Progress

- Completed Major Theme agreements with DOE on 7 of 11 permit addenda.
- Working on Unit Group workshops for 7 of 11 permit addenda.
- Completed most of the Part A and Security addenda.
- Ecology and DOE are tracking their progress against the schedule that was developed.

<i>May 2018</i>	Completed CAP	Rolled-up Data	Presented to DOE	Completed Workshops	Unit Group Workshops
Part A	✓	✓	✓	✓	Started unit group workshops.
Security	✓	✓	✓	✓	Started unit group workshops.
Closure	✓	✓	✓	✓	Starting unit group workshops.
Post-closure	✓	✓	✓	✓	Starting unit group workshops.
Groundwater	✓	✓	✓	✓	Started unit group workshops.
Inspections	✓	✓	✓	✓	Provided instructions to start workshops.
Training	✓	✓	✓	✓	Started workshops with contractors.
Waste Analysis Plan	✓	✓	Presentation is ready.		
Process	Under Review – final draft stage.				
Preparedness & Prevention	✓	On hold pending arrival of Rev 9 BEP's			
Contingency/HEMP	✓	N/A	N/A	✓	HEMP will be used in Preparedness & Prevention workshop.



New Employee

Heather Watts



- Chemist
- WM Section

