



# Department of Ecology

Agency Update

April 2019

Alex Smith, Program Manager



# Outline

- Maia Bellon Letter to Anne White
- High Level Waste Federal Register Notice
- Test Bed Initiative
- TPA
- Permitting Update
- New Faces at Ecology



# Maia Bellon Letter to Anne White

- May 29<sup>th</sup> Letter
  - Expressed concerns with potential changes to the tank waste mission
    - Concerned about potential to change from the Pretreatment Facility to something else
    - The longer the mission takes, the more the State would like to see mitigation measures
    - We would like to have a conversation that lays out the whole picture, and identify a path forward that does not need to be revised or revisited every few years
  - We remain committed to communicating and working together



# High Level Waste Federal Register Notice

- DOE published the final notice on June 4
  - Adopts an interpretive rule substantially similar to what was proposed October 10, 2018
  - Initiates a NEPA process to apply the new rule to a specific waste stream from the Savannah River Site
- We are evaluating our options for how to respond
- Our thoughts on the new interpretive rule are laid out in our comment letter on the October 10<sup>th</sup> proposal.



# Test Bed Initiative

- Worked efficiently with DOE to get the Test Bed Initiative RD&D Permit ready for public comment
- DOE chose to withdraw the permit application
- DOE indicated it may pursue TBI again as early as next year
- We stand ready to work with DOE to get the permit issued when the application is resubmitted



# TPA

- System Plan Negotiations extended through June 12<sup>th</sup>
  - Do not yet have tentative agreement on milestones
  - Public comment period would follow agreement
    - 30-day advance notice
    - Briefing to HAB Tank Waste Committee
    - Feedback to HAB: How did your advice influence our negotiations?
    - Potential additional advice
- Milestones Related to Coordinated Closure (RCRA/CERCLA)
  - Were on the agenda to discuss with you today
  - They were pulled because we do not yet have agreement
  - We anticipate coming back to you with them in September

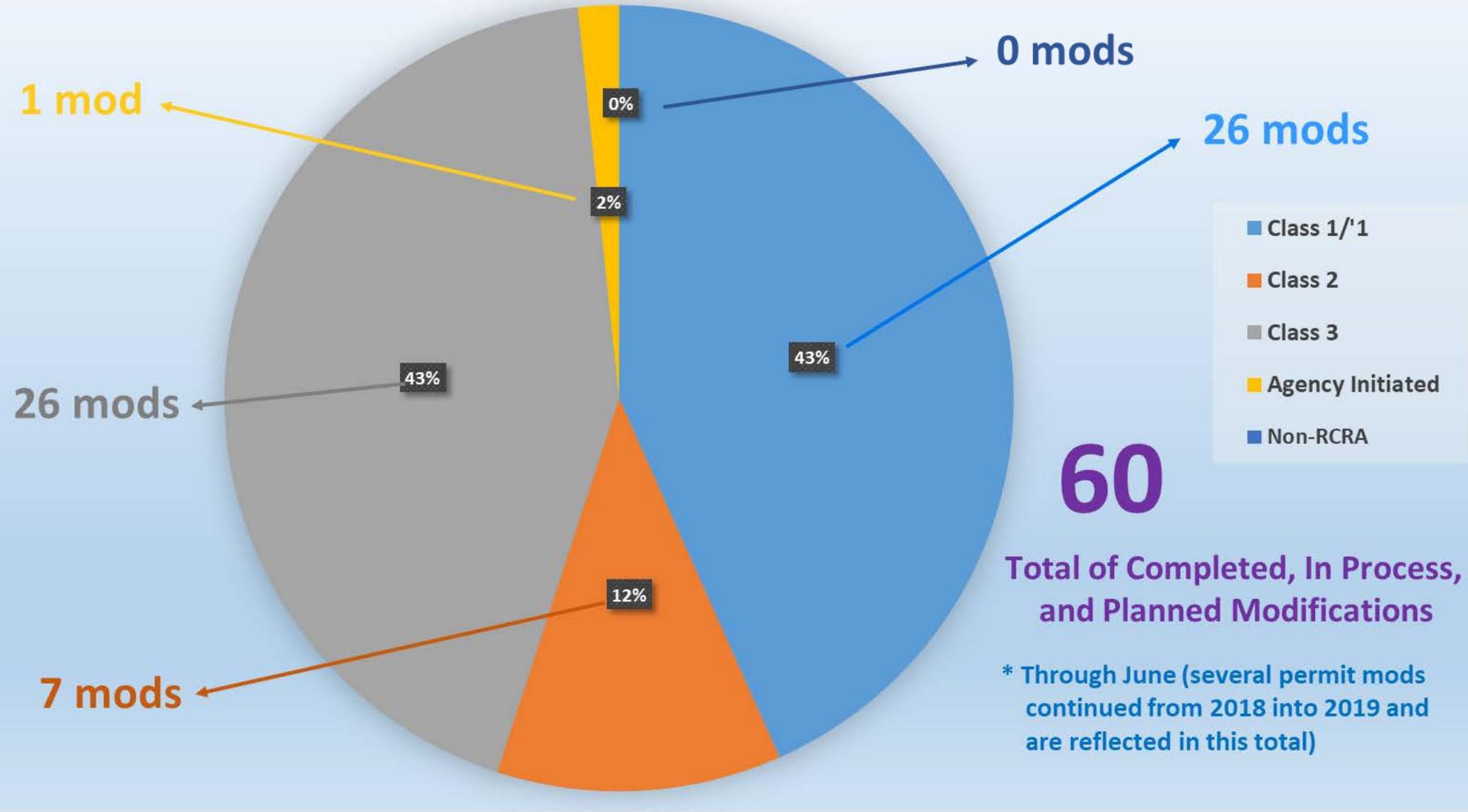


Modifications are often grouped into a single public comment period.

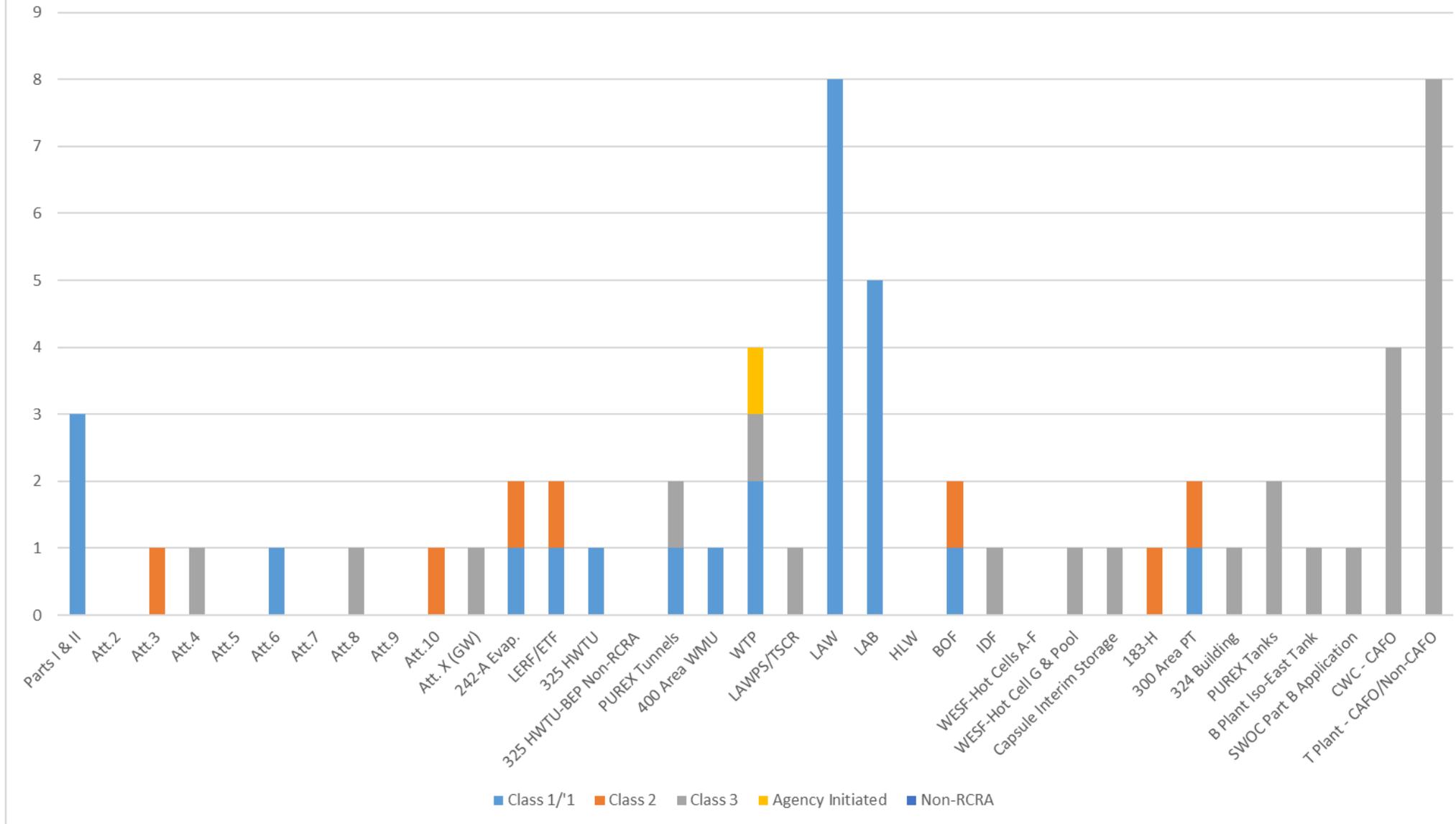
For example, several Class 3 Closure Plans will go out together for Public Comment.

Non-RCRA modifications are related to changes to BEPs that are not RCRA related.

# 2019 Permit Modifications By Class\*



## 2019 Permit Modifications by Unit - Completed and In Process



The table shows permit modifications by Unit; note that WTP and it's related units and the Solid Waste Operations Complex (SWOC – CWC/WRAP, LLBG, and T Plant Complex) have the most modifications of all the units listed.



# Permit Mod Forecast – Rev. 8c

As of June 2019

Unit	Class 2	Class 3	Agency initiated
<b>Capsule interim Storage</b> – Add Unit Group to Permit		X	
<b>Integrated Disposal Facility</b> - Update permit to reflect transition from current Pre-Active Life status to Active Life status (All addenda)		X	
<b>SWOC - T Plant and CWC:</b> 277-T Building, 277-T Outdoor Storage Area, 211-T Pad, 271-T Cage, 221-T Sand Filter Pad, 221-T Railroad Cut Waste Storage Area, 221-T R5 Waste Storage Area, and CWC 2401-W Waste Storage Building		X	
<b>SWOC - CWC:</b> Outside Storage Area A, Outside Storage Area B, and D-10 Outside Storage Area		X	
<b>SWOC - Part B</b> – Add Operating Unit Groups to Permit (CWC/WRAP, LLBG Tr 31/34, LLBG Tr 94, and T Plant Complex)		X	



# Permit Mod Forecast – Rev. 8c

As of June 2019

Unit	Class 2	Class 3	Agency initiated
<b>WESF Operating</b> - Support Cs/Sr capsule movement to dry storage		X	
<b>PUREX Tunnels</b> – Changes to address stabilization of Tunnels 1, 2		X	
<b>PUREX</b> - Closure plans for 203-A Acid Storage Area TK-P4 and 211-A Chemical Storage Area TK-40		X	
<b>PUREX</b> – Closure Plan for Tank 156 (TK-156)		X	
<b>DFLAW Operating Permit</b>		X	
<b>324 Building</b> – RCRA closure plan		X	
<b>Attachment 4</b> – Hanford Emergency Management Plan (HEMP)		X	
<b>Attachment 8</b> – Inspection Plan and Training Plan for Groundwater Monitoring Wells		X	



# Permit Mod Forecast – Rev. 8c Cont.

As of June 2019

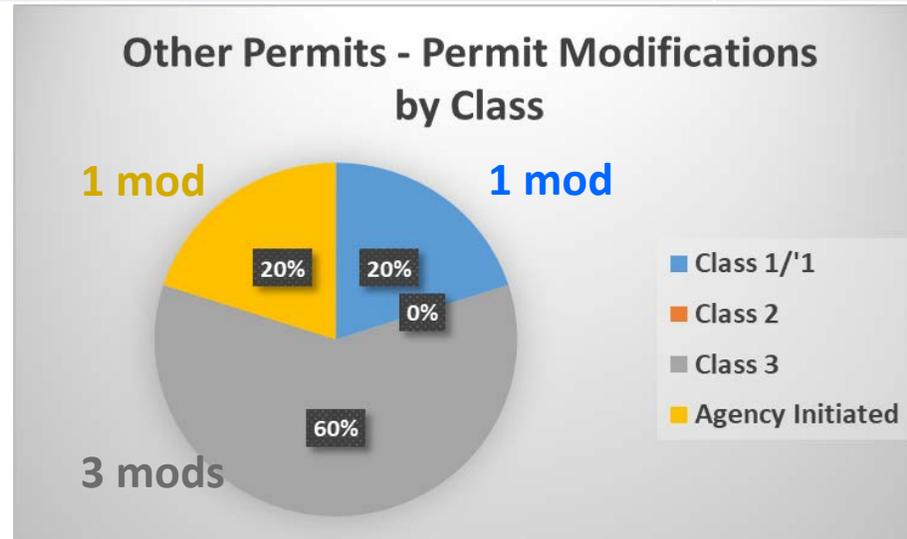
Unit	Class 2	Class 3	Agency initiated
<b>LAWPS/TSCR</b> – Add new Operating Unit Group to Permit		X	
<b>183-H SEB and 300 APT</b> – Replace existing Post-Closure Plans with revised Post-Closure Plans	X		
<b>Attachment 10</b> – Purgewater Management Plan; remove from Permit	X		
<b>LERF/ETF</b> – Add WTP line and upgrades	X		
<b>242-A</b> – Add WTP line, integrity assessment info	X		
<b>WTP</b> – New Outdoor Storage Pad	X		
<b>WTP</b> - Preliminary Risk Assessment			X



# Other Permits – Mod Forecast

As of June 2019

Unit	Class 2	Class 3	Agency initiated
PSNS & IMF – Permit renewal		X	
Framatome – Closed their DWMUs; transitioning to a Permit Lite for groundwater monitoring		X	
Perma-Fix – Permit renewal		X	
Test Bed Initiative (TBI) – RD & D Permit			X



# Rev. 9 Progress

- Completed Major Theme agreements with DOE on 9 of 11 permit addenda.
- Working on Unit Group workshops for 8 of 11 permit addenda.
- Completed most of the Part A and Security addenda. Working on Closure Plans, Waste Analysis Plans, Groundwater Monitoring Plans, and Inspection.
- Ecology and DOE track their progress against a schedule, which has specific completion dates and reporting requirements.

## Reissue Rev. 9 Permit

<i>June 2019</i>	Completed CAP	Rolled-up Data	Presented to DOE	Completed Major Theme Workshops	Unit Group Workshops
Part A	✓	✓	✓	✓	In progress
Security	✓	✓	✓	✓	In progress
Closure	✓	✓	✓	✓	In progress
Post-closure	✓	✓	✓	✓	In progress
Groundwater	✓	✓	✓	✓	In progress
Inspections	✓	✓	✓	✓	In progress
Training	✓	✓	✓	✓	In progress
Waste Analysis Plan	✓	✓	✓	✓	In progress
Process	✓	✓	✓	First Major Theme Workshop on 6/18	
Preparedness & Prevention	✓	✓			
Contingency/HEMP	✓	→	→	✓	8c Workshops complete; waiting on Rev. 8C and Rev. 9 BEPs



# New Employees

Binod  
Chaudhary



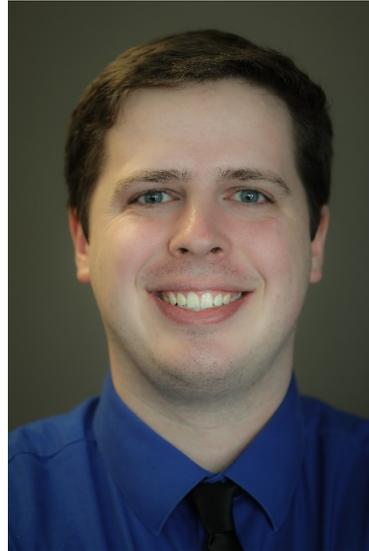
WM EE-3

Phillip Buser



TPA Compliance  
inspector

Ryan Miller



PI Social media,  
media and web

Isaac Leggett



TPA Summer intern

Mark Pakula



WM Section  
Manager



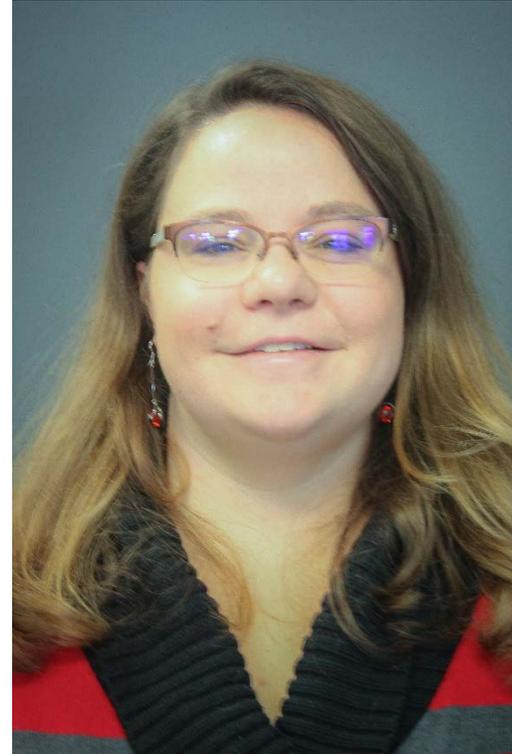
# Familiar Faces – New Roles

Nina Menard



Interim Cleanup  
Section Manager

Stephanie Schleif



Deputy Program  
Manager

# Questions?

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