



# Department of Ecology

Agency Update

June 2020

Alex Smith, Nuclear Waste Program Manager



# Outline

- Ecology Work During COVID-19 Restrictions
- Holistic negotiations
- Compliance activities
- Permitting activities
- New faces at Ecology



# Ecology Work During COVID-19 Restrictions

- Ecology's Richland office is closed; only essential personnel go in on an as-needed basis.
- Staff have transitioned to teleworking and are getting lot of work done
- People will start returning to the office in phases, starting in July with no more than 15% of staff in the office in the first phase.
- Ecology will be complying with the directive for furloughs; in July the furlough days will be July 2, 10, 17 and 24.
- Dates for additional furloughs are TBD.



# Holistic negotiations

- Ecology proposed holistic negotiation of tank waste retrieval, treatment.
- The parties spent time negotiating the scope of what will be discussed and the mediation agreement.
- Parties have met separately with the mediator from the Federal Mediation Service
- Parties will have the first joint session with the mediator on Thursday, June 25.



# Ecology compliance inspections – what's the starting point before COVID?

- USEPA-Ecology Performance Partnership Agreement (PPA) for regulating hazardous waste sites in Washington requires Ecology to make an annual Compliance Evaluation Inspection of Federal facilities like Hanford
  - Ecology must annually inspect each of Hanford's ~30 UNIT groups FOR treating, storing or disposing of hazardous waste
    - For example, the 149 Single Shell Tanks is one unit group
    - Ecology is on schedule to complete 2019-2020 PPA commitments for Hanford



# Ecology compliance inspections – what we're doing differently

How have inspections changed due to COVID-19 stay at home?

- Ecology routinely makes records requests for inspections
- We are focusing on records reviews since stay-at-home
  - Without field visits to inspected unit groups
  - We are leveraging our long-term familiarity with the Hanford site
  - Our compliance lead has over 20 years experience at Hanford and, multiple field visits and inspections of each of the unit groups



# How is Ecology dealing with things that DOE can't do during stay at home?

- Ecology Compliance group already had monthly meetings where we discuss compliance with DOE
  - Discussing both inspection findings
  - Discussing Hanford's unique or challenging operational issues
- Since stay-at-home
  - Consistent with state-wide and national guidance, USDOE reports to Ecology things they can't do during stay-at-home
  - Ecology maintains a list of these compliance issues, circulates it within Ecology, and looks at these issues in a state-wide context

# Ecology compliance inspections – what's next

- Nuclear Waste Program will follow Ecology-wide phased return to field work
- Inspections based on records reviews will continue
- Phase 1 field work: field visits with drive-around observations from a vehicle
  - One compliance inspector is currently approved
  - Currently no plan for Hanford site visits
- Phase 2 field work: includes walking through facilities in small groups
  - Waiting for Benton County to meet governor's criteria for Phase 2 reopening of businesses

# Ecology compliance activities Feb 2020 to May 2020

## Inspections conducted

- B Plant – 276 BA Closure – February 25, 2020
- PUREX Tunnels – February 25, 2020
- Single Shell Tank System – February 27, 2020
- Integrated Disposal Facility – March 5, 2020
- Non-Radioactive Dangerous Waste Landfill – March 11, 2020
- Central Waste Complex/Waste Receiving and Packaging Facility – March 31, 2020
- Double Shell Tank System – April 20, 2020
- Low Level Burial Grounds (LLBG) Trenches 31 and 34 – April 30, 2020
- Puget Sound Naval Shipyard – May 20, 2020



# Ecology Compliance Activities Feb 2020 to May 2020

## Compliance Reports Issued

- 222-S Lab Complex Compliance Report – February 3, 2020
- 241-CX Tank System Compliance Report – March 10, 2020
- Hexone Storage & Treatment Facility Compliance Report – March 20, 2020
- LLBG Trenches 31 and 34 Compliance Report – April 6, 2020
- Single Shell Tank Generator Compliance Report – April 15, 2020
- 242-A Evaporator Compliance Report – May 8, 2020
- B-Plant 276-BA Closure Compliance Report – May 8, 2020
- PUREX Tunnels Compliance Report – May 8, 2020



# Permit Modifications Continue

- Ecology continues to process draft and final permit modifications during the “Stay at Home, Stay Healthy” and “Safe Start” Orders.
- Draft and final permit modifications are available online at the Ecology website.
- Members of the public can request hard copies of documents and DVDs of permit modification if electronic accessibility is not possible.
- The Public Information Repositories and Administrative Record receives draft and final permit modifications electronically to post on their websites.
- Once Ecology can successfully send DVDs and hard copies, we will ensure those are in place at the appropriate locations, according to the WAC and Tri-Party Agreement.
- Ecology continues to work to ensure members of the public receive the information in support of permit modifications.



# Opportunities for public involvement

Unit	Public Comment Period
<p><b><u>Class 2 Permit Modification</u></b> – Proposed changes include revisions to the Permit Conditions and Process Information Chapter to include information on double-shell tank transfer line penetrations and jumpers.</p>	May 8, 2020 to July 7, 2020
<p><b><u>Class 3 Permit Modification</u></b> – Closure Plans at T-Plant (211-T Pad, 221-T Railroad Cut, 221-T Sand Filter Pad, 271-T Cage, 277-T Building, 277-T Outdoor Storage Area) and Central Waste Complex (2401-W Waste Storage Building).</p>	June 8, 2020 to July 24, 2020
<p><b><u>Class 2 Permit Modification</u></b> - Revised Process Information and Inspection Addenda to include information on the tie-in of PC-5000 line and LERF-ETF Catch Basin 242AL-41. In addition, it proposes language regarding inspection of leak detection.</p>	July 10, 2020 to September 9, 2020
<p><b><u>Class 3 Permit Modification</u></b> - Incorporate LERF-ETF Basin 41 into Hanford Site-wide Permit Operating Unit Group 3. LERF Basins are lined surface impoundments used to store and treat aqueous waste. The waste is pumped from LERF to ETF for treatment. The addition of LERF Basin 41 is in support of DFLAW Operations.</p>	July 10, 2020 to September 9, 2020



# Opportunities for public involvement

Unit	Dates
<p><b><u>Class 3 Permit Modification</u></b> - Incorporate LAWPS/TSCR into the Hanford Site-wide Permit as Operating Unit Group 1. The LAWPS/TSCR unit is a mixed waste treatment and storage unit that will treat Double-Shell Tank supernatant waste. The LAWPS/TSCR will support the DFLAW Operations.</p>	<p>June 22, 2020 to August 7, 2020</p>
<p><b><u>Class 3 Permit Modification</u></b> – The Waste Encapsulation Storage Facility permit modification includes proposed permit language to prepare for the capsule transfer from the pool cells to the Capsule Interim Storage facility.</p>	<p>August 3, 2020 to September 18, 2020</p>
<p><b><u>Class 3 Permit Modification</u></b> – Includes proposed permit language in support of operations and allow for disposal of mixed low-level waste in both disposal cells of the Integrated Disposal Facility, add receipt of mixed low-level wastes from Hanford Site operations, and allow for the construction of a treatment pad and a storage pad.</p>	<p>December 2020 to January 2021</p>
<p><b><u>State Waste Discharge Permit</u></b> – ST0004500 – State-Approved Land Disposal Site permit renewal</p>	<p>July to August 2020</p>



# New Employees

Chris Wend



Waste Management  
Section Manager

Kyle Rucker



Environmental Specialist  
Cleanup Section

Deirdra Hahn



Environmental Specialist  
Waste Management  
Section

Garrett Day



Hydrogeologist  
Cleanup Section

# Questions?

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