



Department of Ecology

Agency Update

September 2019

Stephanie Schleif, Deputy Program Manager



Outline

- TPA and Consent Decree
- Permitting Update
- New Faces at Ecology



TPA

- System Plan Negotiations concluded July 11
 - Ecology delivered 5 signed TPA changes to ORP: June 27
 - ORP signed 3, rejected 2
 - Milestones for new, compliant tanks are in TPA dispute process
 - Additional interim barriers are being negotiated separately
 - These circumstances pre-empted the normal public comment period
 - Ecology and ORP are preparing a fact sheet to summarize events
- Milestones Related to Coordinated Closure (RCRA/CERCLA)
 - Have only recently reached Tri-Party tentative agreement
 - Ecology asked to be on the agenda
 - Tri-parties will start a public comment period in about 30 days



Holistic Negotiations

- Ecology Director Maia Bellon proposed holistic negotiation of tank waste retrieval, treatment: May 29
 - Referring to both TPA milestones and Consent Decree
 - ORP Manager responded: June 14 then last week
 - TPA milestones were issued by Ecology: June 27 (previous slide)
- ORP notified Ecology of “serious risk” to Consent Decree milestones: September 4
 - ORP has notified Ecology that it will engage in holistic negotiations (Sept 11)
 - Ecology is framing its thoughts on the scope of negotiations



Ecology Compliance Activities June 2019 to August 2019

Inspections Conducted

- 222-S Laboratory Fire Inspection – 6/5/2019
- 10 Groundwater monitoring inspections – 6/20/2019
- 325 Building – 7/23/2019
- Double Shell Tank System – 7/30/2019
- Low Level Burial Grounds Trenches 31 and 34 – 8/6/2019



Ecology Compliance Activities June 2019 to August 2019

Compliance Reports Issued

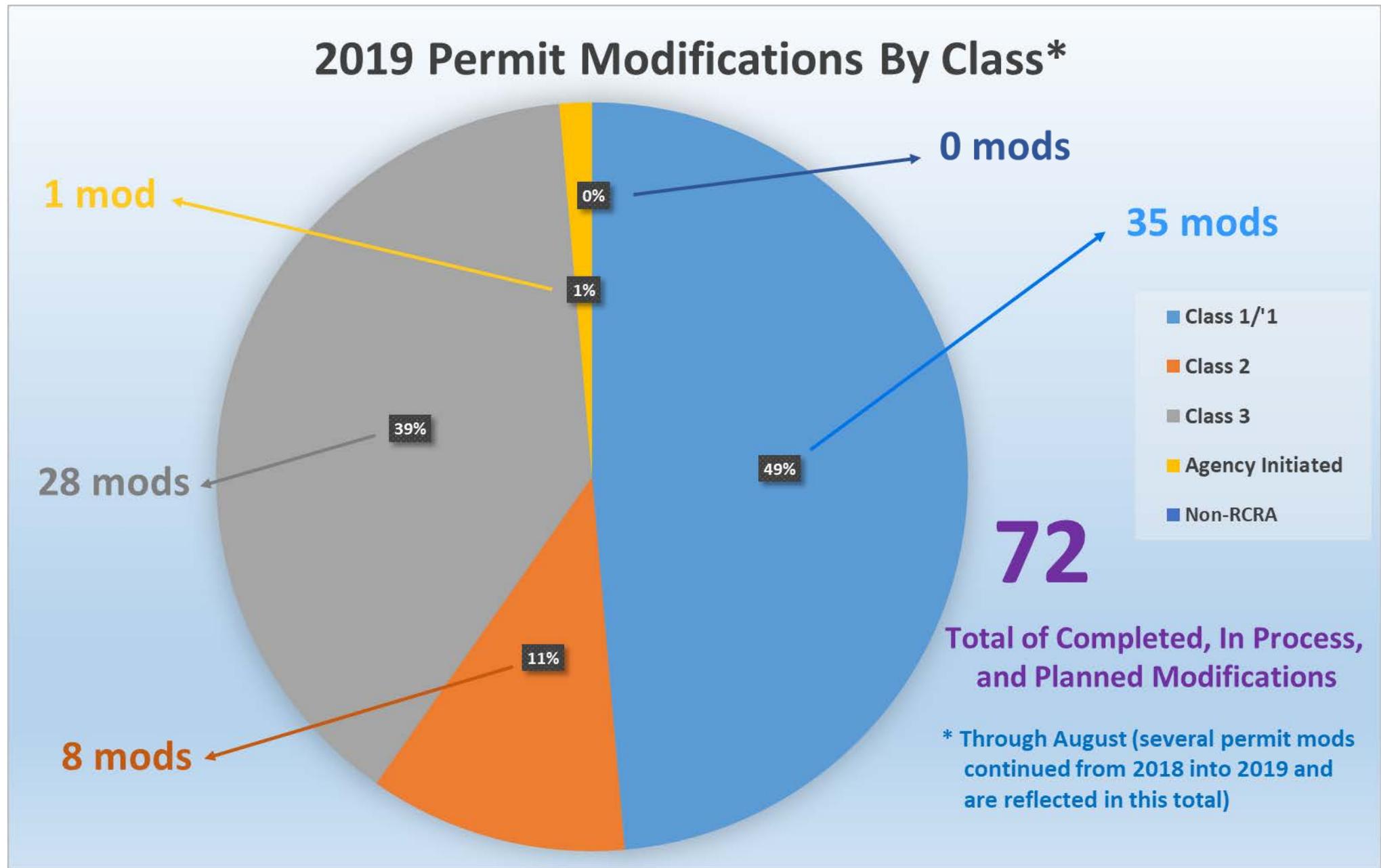
- 222-S Laboratory Fire Inspection – 6/20/2019
- T Plant – 7/5/2019
- CWC/WRAP – 7/10/2019
- Perma-Fix Northwest – 7/11/2019
- B Plant – 7/19/2019
- Puget Sound Naval Shipyard – 7/23/2019
- Single Shell Tank System – 8/8/2019



Modifications are often grouped into a single public comment period.

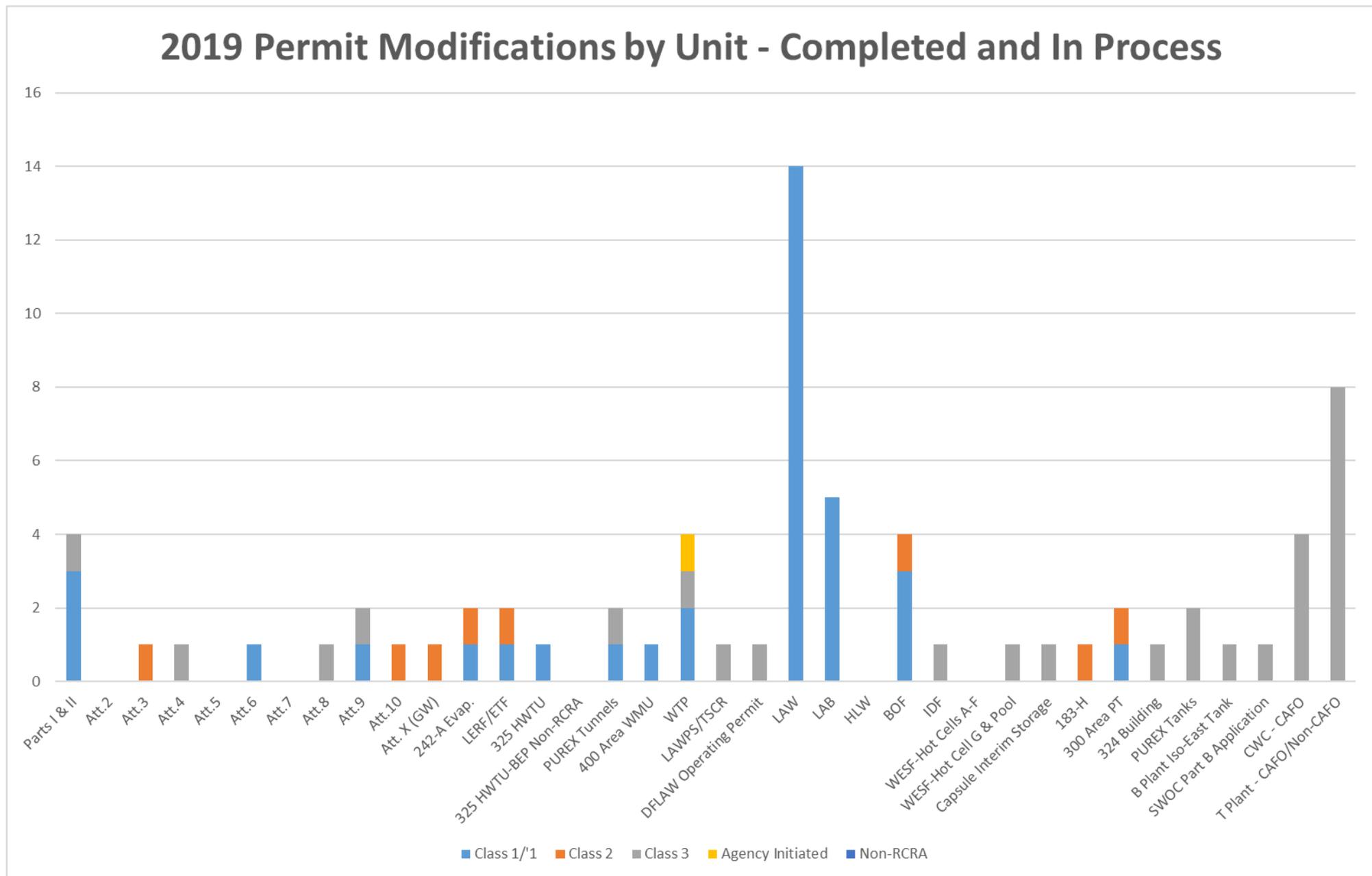
For example, several Class 3 Closure Plans will go out together for Public Comment.

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



2019 Permit Modifications by Unit - Completed and In Process

The table shows permit modifications by Unit; note that WTP and its 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 August 2019

Unit	Class 2	Class 3	Agency initiated
Capsule interim Storage – Add unit group to permit		X	
Integrated Disposal Facility - Update permit to reflect transition from current pre-active life status to active life status (all addenda)		X	
SWOC - T Plant and CWC: 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	
SWOC - CWC: Outside Storage Area A, Outside Storage Area B, and D-10 Outside Storage Area		X	
SWOC - Part 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 Con't

As of August 2019

Unit	Class 2	Class 3	Agency initiated
WESF Operating - Support Cs/Sr capsule movement to dry storage		X	
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	
DFLAW Operating Permit		X	
324 Building – RCRA closure plan		X	
Attachment 4 – Hanford Emergency Management Plan (HEMP)		X	
Attachment 8 – Inspection plan and training plan for groundwater monitoring wells		X	



Permit Mod Forecast – Rev. 8c Cont.

As of August 2019

Unit	Class 2	Class 3	Agency initiated
LAWPS/TSCR – Add new operating unit group to permit		X	
183-H SEB and 300 APT – Replace existing post-closure plans with revised post-closure plans	X		
Attachment 10 – Purgewater Management Plan; remove from permit	X		
LERF/ETF – Add WTP line and upgrades	X		
242-A – Add WTP line, integrity assessment info	X		
WTP – New outdoor storage pad	X		
WTP – Preliminary risk assessment			X



Rev. 9 Progress

- Completed major theme agreements with DOE on 9 of 11 permit addenda.
- Working on unit group workshops for 9 of 11 permit addenda.
- Completed most of the Part A and security addenda. Working on closure plans, waste analysis plans, groundwater monitoring plans, training, and inspection.
- Ecology and DOE track their progress against a schedule, which has specific completion dates and reporting requirements.

CAP Status

Reissue Rev. 9 Permit

<i>June 2019</i>	Completed CAP	Rolled-up Data	Presented to DOE	Completed Major Theme Workshops	Addenda Complete	Addenda in Process
Part A	✓	✓	✓	✓	27 of 29 complete	2 of 29
Security	✓	✓	✓	✓	16 of 20 complete	4 of 20
Closure	✓	✓	✓	✓	4 of 27 complete	22 of 27
Post-closure	✓	✓	✓	✓	2 of 17 complete	3 of 17
Groundwater	✓	✓	✓	✓	1 of 14 complete	12 of 14
Inspections	✓	✓	✓	✓	1 of 18 complete	17 of 18
Training	✓	✓	✓	✓	1 of 20 complete	19 of 20
Waste Analysis Plan	✓	✓	✓	✓	1 of 12 complete	6 of 12
Process Information	✓	✓	✓	Still in workshops	1 of 26 complete	6 of 26
Preparedness & Prevention	✓	✓			1 of 26 complete	5 of 26
Contingency/HEMP	✓	→	→	✓	1 of 26 incomplete	11 of 26

Notes:

- Some of the Post-Closure Addenda are included in the Closure Addenda.
- Not all units have all addenda. Security, Inspection, and/or Training Addenda are waived for some units.
- Not all units have Groundwater Monitoring Addenda.
- Not all units require a WAP addenda; especially those no longer operating and closing.
- Grout Vaults have only a Part A addenda.



Opportunities for public involvement for other permits

Unit	Dates
State waste discharge permit – ST0045514 – 200 Area Evaporative Sewage Lagoon permit renewal	Proposed public comment period mid-October 2019
Air – Air Operating Permit renewal	Final permit issued 7/15/2019 Effective 8/1/2019
Air – DE18NWP-001 Notice of Construction - AW tank farm stack extension	Public comment period was held 7/15 – 8/16/2019
Air – DE05NWP-001 Notice of Construction Revision – Remove AW tank farm due to new permit DE18NWP-001	8/5 – 8/20/2019 15-day internet notice of receipt
Air – De16NWP-001 Notice of Construction - Increase exhauster flow rate for retrievals of A and AX tank farms	Public comment period TBD
Air- DE02NWP-002 Notice of Construction Revision - Modify emissions and control devices for WTP LAW melter and LAB	Public comment period TBD



Work Force Management

- Working with DOE on recruitment
 - Tri-Cities Connect, October 22, 2019 at the Three River Convention Center
 - Coordinate on other activities and job fairs
- Encourage internships to increase interest in working for state agencies – especially the Nuclear Waste Program
 - Reviewing and revising internship program
- Succession planning
 - Retain institutional knowledge
 - Smooth transitions for incoming personnel



New Employees

Dan Thompson



Rev 9 Permit Coordinator

Questions?

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Nuclear Waste Program
509-372-7950
Hanford@ecy.wa.gov

