

Closure Units at T-Plant & Central Waste Complex



Public comment period

June 8, 2020 to July 24, 2020

Please submit comments

Electronically (preferred) via:

<http://wt.ecology.commentinpu.com/?id=Pus9r>

By U.S. Mail or hand-delivery:

Daina McFadden
3100 Port of Benton Blvd
Richland WA 99354

Public hearing

A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, contact:

Daina McFadden
509-372-7950

Hanford@ecy.wa.gov

Special accommodations

To request an ADA accommodation, contact Ecology by phone at 509-372-7950 or email at

Daina.McFadden@ecy.wa.gov,

or visit

ecology.wa.gov/accessibility.

For Relay Service or TTY call 711 or 877-833-6341.

Public comment invited

The Washington State Department of Ecology (Ecology) is proposing a modification to the *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste* (Site-wide Permit). This modification affects units at the T Plant and the Central Waste Complex (CWC).

T Plant and CWC are owned and operated by the U.S. Department of Energy (USDOE) and co-operated by CH2M HILL Plateau Remediation Company (Permittees).

The proposed modification is to close the seven container storage areas listed below. The units are going into the Site-wide Permit Part V, as Closure Unit Groups. More detailed descriptions of these areas (units) are provided on page 3.

- T Plant 277-T Building, Closure Unit Group 27
- T Plant 277-T Outdoor Storage Area, Closure Unit Group 28
- T Plant 271-T Cage, Closure Unit Group 29
- T Plant 211-T Pad, Closure Unit Group 30
- T Plant 221-T Sand Filter Pad, Closure Unit Group 37
- CWC 2401-W Waste Storage Building, Closure Unit Group 39
- T Plant 221-T Railroad Cut, Closure Unit Group 41

Consent Agreement and Final Order for Closure of Solid Waste Operations Complex Units

On June 26, 2013, USDOE and the U.S. Environmental Protection Agency signed a [Consent Agreement and Final Order](#), Docket No. RCRA-10-2013-0113 (CAFO). The CAFO outlines steps the Permittees must take to satisfy violations that were found during inspections of the Solid Waste Operations Complex (SWOC) in 2012.

One of the steps is to close parts of the SWOC that are not in use or were never authorized for use. To meet this CAFO step, USDOE submitted a Class 3 permit modification request in October 2013 to close several inactive dangerous waste management units at the SWOC.

The 2013 permit modification request included the nine units identified in the CAFO and five units not in the CAFO. The nine CAFO units are located at T Plant, CWC, and the Low-Level Burial Grounds (LLBG) Trenches 31 and 34. The five non-CAFO units are located at T Plant.

Fifty-three public comments were received during USDOE’s public comment period for the 2013 permit modification request. On July 30, 2015, Ecology issued a Response to Comments (Publication no. 15-05-010). This Response to Comments was issued with the draft permit modification adding Closure Unit Group 4, FS-1 Outdoor Container Storage Area, to the Site-wide Permit. The FS-1 Outdoor Container Storage Area CAFO unit was closed in 2016.

The seven units in this current proposed permit modification have not stored waste since November 2010. The Permittees plan to clean close these units. They have already removed all waste, reviewed records, and visually inspected the units. Ecology has also completed a visual inspection of the units. Future storage of dangerous or mixed waste is not authorized.

The remaining six units awaiting closure are at the T-Plant and CWC. Ecology will hold 45-day comment periods for adding the remaining units to the Site-wide Permit over the next few years.

Why cleanup matters

Ecology works to make sure Hanford’s cleanup follows our state’s regulations to protect the air, land, water, and citizens. It is important that only areas authorized by the Hanford Site-wide Permit are allowed to store waste. Areas that have been used without authorization need to be closed. This permit modification would add seven units to the permit in preparation for closure.

Reviewing the proposed modifications

Ecology invites the public to review and comment on the proposed permit modification. See page 1 for comment period dates and information on how to submit comments.

Copies of the proposed closure plans and supporting documentation will be available during the public comment period online at Ecology’s website at <https://www.ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods>. The documents will also be available at the Hanford Public Information Repositories listed on page 4.

T-Plant and CWC



Hanford area map

Description of T-Plant & CWC units to be closed



Closure Unit Group 27, 277-T Building (non-CAFO)

The 277-T Building is a pre-engineered, steel structure on an uncoated concrete slab on grade foundation. It is approximately 33 feet wide by 39 feet long by 23 feet high. It serves as equipment and material storage to support T-Plant operations. The 277-T Building stored one container of mixed waste with a total volume of 35 cubic yards.



Closure Unit Group 28, 277-T Outdoor Storage Area (CAFO)

The 277-T Outdoor Storage Area consists of two uncoated concrete pads and an asphalt area surrounding the 277-T Building. It is 95 feet on the south side by 86 feet on the west side by 135 feet on the north side by 76 feet on the east side. The area was previously used for storing containers of various sizes and volumes, and a variety of waste streams, to ensure adequate capacity and operational flexibility to support T Plant activities. The 277-T Outdoor Storage Area may have been used to manage dangerous and mixed waste in a central accumulation area or satellite accumulation area.



Closure Unit Group 29, 271-T Cage (CAFO)

The 271-T Cage is an uncoated concrete slab approximately 20 feet long by 10 feet wide. It is defined on the south side by the 271-T Building and the remaining three sides by metal chain-link fencing covered with a corrugated metal roof. The 271-T Cage may have been used to manage dangerous and mixed waste in a central accumulation area or satellite accumulation area.



Closure Unit Group 30, 211-T Pad (CAFO)

The 211-T Pad is a curbed, uncoated concrete pad approximately 59 feet long by 20 feet wide. It was primarily used as secondary containment for tanker trucks performing non-waste chemical transfers. Containerized dangerous and mixed waste was also stored on the 211-T Pad.



Closure Unit Group 37, 221-T Sand Filter Pad (CAFO)

The 221-T Sand Filter Pad is an uncovered gravel area approximately 180 feet long by 60 feet wide. It was previously used for storing containers of various sizes and volumes, and a variety of waste streams, to ensure adequate capacity and operational flexibility to support T Plant activities. It was used to manage dangerous and mixed waste in a central accumulation area or satellite accumulation area.



Closure Unit Group 39, 2401-W Waste Storage Building (CAFO)

The 2401-W Waste Storage Building is a pre-engineered steel structure approximately 50 feet wide by 80 feet long by 20 feet high. It is located on the south end of the CWC. The foundation is integrated into a perimeter concrete curb and the floors are coated with an epoxy resin. The 2401-W Waste Storage Building stored 318 containers of dangerous and mixed waste with a total volume of 266 cubic yards.



Closure Unit Group 41, 221-T Railroad Cut (non-CAFO)

The 221-T Railroad Cut is an uncovered gravel area with railroad tracks. It is approximately 309 feet long by 50 feet wide at the fence and 33 feet wide at the 221-T Railroad Tunnel end. It was used to store mixed waste in a central accumulation area or satellite accumulation area while awaiting transfer into or out of the 221-T Railroad Tunnel.



DEPARTMENT OF
ECOLOGY
State of Washington

Nuclear Waste Program
3100 Port of Benton Blvd
Richland, WA 99354

Hanford's Information Repositories and Document Review Locations

Ecology Nuclear Waste Program
Resource Center
3100 Port of Benton Blvd.
Richland, WA 99354
509-372-7950

U.S. Department of Energy
Administrative Record
2440 Stevens Drive, Room 1101
Richland, WA 99354
509-376-2530

Washington State University Tri-Cities
Department of Energy Reading Room
2770 Crimson Way, Room 101L
Richland, WA 99354
509-375-7443

University of Washington
Suzzallo Library
P.O. Box 352900
Seattle, WA 98195
206-543-5597

Gonzaga University
Foley Center
502 E Boone Avenue
Spokane, WA 99258
509-313-6110

Portland State University
Millar Library
1875 SW Park Avenue
Portland, OR 97207
503-725-4542