Response to Comments
276-BA Organic Storage Area
March 11, 2019 to April 26, 2019

Summary of a public comment period and responses to comments

May 2019
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Publication and Contact Information

This publication is available on the Department of Ecology’s (Ecology) website at https://fortress.wa.gov/ecy/publications/SummaryPages/1905006.html

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- Northwest Regional Office, Bellevue  425-649-7000
- Southwest Regional Office, Lacey    360-407-6300
- Central Regional Office, Yakima      509-575-2490
- Eastern Regional Office, Spokane     509-329-3400

Ecology publishes this document to meet the requirements of Washington Administrative Code 173-303-840 (9).

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Response to Comments

276-BA Organic Storage Area

March 11, 2019 to April 26, 2019

Nuclear Waste Program
Washington State Department of Ecology
Richland, Washington
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Introduction

The Washington State Department of Ecology’s Nuclear Waste Program (Ecology) manages dangerous waste within the state by writing permits to regulate its treatment, storage, and disposal. When a new permit or a significant modification to an existing permit is proposed, Ecology holds a public comment period to allow the public to review the change and provide formal feedback. (See Washington Administrative Code [WAC] 173-303-830 for types of permit changes.)

The Response to Comments is the last step before issuing the final permit, and its purpose is to:

- Specify which provisions, if any, of a permit will become effective upon issuance of the final permit, providing reasons for those changes.
- Describe and document public involvement actions.
- List and respond to all significant comments received during the public comment period and any related public hearings.

This Response to Comments is prepared for:

Comment period: 276-BA Organic Storage Area, March 11, 2019, through April 26, 2019


Permittee(s): U.S. Department of Energy Richland Operations
CH2M Hill Plateau Remediation Company

To see more information related to the Hanford Site and nuclear waste in Washington, please visit our website: https://www.ecology.wa.gov/Hanford.

Reasons for modifying the permit

The Washington State Department of Ecology (Ecology) is proposing a change to the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Revision 8c (Permit). This change incorporates the Dangerous Waste Portion for the Treatment, Storage, and Disposal of Dangerous Waste for the 276-BA Organic Storage Area into the Permit. The 276-BA Organic Storage Area is located in the northeast portion of the B Plant Complex in the 200 East Area of the Hanford Site.

The purpose of the proposed permit modification is to describe clean closure activities that will be completed within 180 days of the start date. Clean closure will eliminate the need for future post-closure inspections, monitoring, and maintenance of the 276-BA Organic Storage Area.
Response to Comments  
276-BA Organic Storage Area

The proposed modification to the Permit will be located in Part V, Closure Unit Group 32. The following is a summary of the proposed additions to Part V of the Permit.

**Permit Conditions:** Ecology drafted unit-specific permit conditions to reflect the dangerous waste permit requirements for closure of the 276-BA Organic Storage Area.

**Addendum H, Closure Plan:** The closure plan proposes clean closure activities for the 276-BA Organic Storage Area. Closure activities include:

- Adding absorbent to stabilize the remaining liquid waste in the container (if found).
- Removing the container, intact, and transporting it to the Environmental Restoration Disposal Facility (ERDF).
- Flood grouting the interior of the container at ERDF prior to final disposal.
- Demolishing, containerizing, and disposing of the secondary containment structure at ERDF.
- Excavating soil beneath the structure up to 3 feet, containerizing the soil, and disposing at ERDF.
- Focused sampling of the site is proposed due to the relatively small size of the secondary containment structure.
- Sampling at locations where concrete joints, the trench, and the sump are located.
Public involvement actions

The Class 3 Permit Modification and first 60-day public comment period on the 276-BA Organic Storage Area was held in 2016 and significant changes were made to the Closure Plan as part of Ecology’s completeness determination and technical review.

Ecology held a second 45-day public comment period for the Class 3 Permit Modification from March 11, 2019, through April 26, 2019.

The following actions were taken by Ecology to notify the public:

- Mailed a public notice announcing the comment period to 1282 members of the public.
- Placed a public announcement legal classified advertisement in the *Tri-City Herald* on March 10, 2019.
- Emailed a notice announcing the start of the comment period to the Hanford-Info email list, which has 1357 recipients.

The Hanford information repositories located in Richland, Spokane, and Seattle, Washington and Portland, Oregon received the following documents for public review:

- Focus Sheet
- Transmittal letter
- Response to comments document from the first part of the Class 3 modification
- Draft 276-BA Organic Storage Area Permit Modification documents

The following public notices for this comment period are in Appendix A of this document:

- Public notice (focus sheet)
- Classified advertisement in the *Tri-City Herald*
- Notice sent to the Hanford-Info email list
List of Commenters

The table below lists the names of organizations or individuals who submitted a comment on the 276-BA Organic Storage Area Permit modification. The comments and responses follow.

<table>
<thead>
<tr>
<th>Commenter</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mike Conlan</td>
<td>Citizen</td>
</tr>
</tbody>
</table>
Attachment 1: Comments and responses
Letter I-1: Mike Conlan, 3/21/19 6:34 PM PT

Comment I-1-1

1. Remove all nuclear waste,
2. Do not allow anymore nuclear waste into the facility,
3. Replace all the single storage tanks,
4. Stop all the nuclear leakage entering the Columbia River

Ecology Response to I-1-1

Ecology is working to ensure that long-term storage, treatment and disposal of the waste is protective of human health and the environment. The proposed permit changes are not to allow new waste, but to better manage the waste already at Hanford. Single-shell tanks are not in the scope of this comment period. Ecology does agree the tanks pose a threat. We believe a better approach to addressing it is to remove the waste from the single-shell tanks and put it in the compliant double-shell tanks to prepare for eventual treatment in the Waste Treatment Plant now being built. The permit modification proposes clean closure for the 276-BA Organic Storage Area. Clean closure will eliminate the need for future post-closure inspections, monitoring, and maintenance.
Appendix A: Copies of all public notices

Public notices for this comment period:

- Public notice (focus sheet)
- Classified advertisement in the *Tri-City Herald*
- Notice sent to the Hanford-Info email list
Public comment invited

The Washington State Department of Ecology (Ecology) is proposing a change to the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Revision 8c (Permit). This change incorporates into the Permit, the Dangerous Waste Portion for the Treatment, Storage, and Disposal of Dangerous Waste for the 276-BA Organic Storage Area. The 276-BA Organic Storage Area is located in the northeast portion of the B Plant Complex in the 200 East Area of the Hanford Site. The proposed modification to the Permit will be located in Part V, Closure Unit Group 32.

The permittees are:

U.S. Department of Energy Richland Operations (USDOE)
P.O. Box 550
Richland, Washington 99352

CH2M Hill Plateau Remediation Company
P.O. Box 1600
Richland, Washington 99354

Ecology invites you to review and comment on this proposed permit modification. The comment period begins March 11, 2019, and ends April 26, 2019.

The class 3 permit modification will include the following:

- Permit Conditions
- Addendum H, Closure Plan which proposes clean closure activities that will be completed within 180 days of the start date. The diagram on page 3 provides a schematic of the ISO-East Container. USDOE initiated a Class 3 permit modification to add the 276-BA Organic Storage Area to the Permit on May 4, 2016. The 60 day public comment period as required by Washington Administrative Code (WAC) 173-303-830(4)(c) began on April 25, 2016, and ended on August 6, 2016.
Ecology issued a Letter of Incompleteness and Notice of Deficiency for the Class 3 Permit Modification Request on August 11, 2016. We resolved the deficiencies with the permittees and the permit modification was determined to be complete. Ecology responded to one public comment submitted during that comment period. Changes to the closure plan include the following:

- The 276-BA container was previously classified as a tank in the B Plant Complex Part A Form concerning the B Plant Organic Mixed Waste Storage System. Upon further review, USDOE determined that 276-BA ISO East should be classified as a container because it meets the RCRA definition of a container in WAC-173-303-040. 276-BA ISO East will be closed under the container standards in WAC 173-303-630(10).

- In addition, the components of the United States Environmental Protection Agency 7 Step Data Quality Objectives were evaluated and identified in the Closure Plan for 276-BA Organic Storage Area.

**Background**

The 276-BA Organic Storage Area is located in a secure fenced area in the northeast portion of the B Plant Complex in the 200 East Area of the Hanford Site.

Historically, the 276-BA Organic Storage Area was part of the Organic Mixed Waste Storage System, which was used for chemical processing and to store organic chemicals used in the recovery and purification of strontium.

The 276-BA Organic Storage Area consists of a single storage container (ISO East) and secondary containment structure. The secondary containment structure has two separate compartments. The west compartment is empty and was never used for dangerous waste storage or treatment.

The east compartment contains the ISO East Container. This container, which received waste directly from the B Plant Complex, was placed in the 276-BA Organic Storage Area secondary containment structure, sealed and intact. The stored wastes were then removed from the ISO East container to a tanker truck for offsite disposal in 1997. Any potential releases from the ISO East container would likely be found in the location of the sump or trench within the ISO East portion of the secondary containment structure. These areas have been identified for soil sampling to demonstrate clean closure.

The ISO-East container currently contains less than two gallons of washed organic residues consisting of normal paraffin hydrocarbons (NPH), di-(2-ethylhexyl) phosphoric acid (D2EHPA), tributyl phosphate (TBP), and small amounts of strontium-89/90 and cesium-137.
Why cleanup matters

Ecology would like your comments on the proposed draft language that describes clean closure in the closure plan. Clean closure will eliminate the need for future post-closure inspections, monitoring, and maintenance, and will include the following:

- Adding absorbent to stabilize the remaining liquid waste in the container (if found).
- Removing the container, intact, and transporting it to the Environmental Restoration Disposal Facility (ERDF).
- Flood grouting the interior of the container at ERDF prior to final disposal.
- Demolishing, containerizing, and disposing of the secondary containment structure at ERDF.
- Excavating soil beneath the structure up to 3 feet, containerizing, and disposing at ERDF.
- Focused sampling of the site is proposed due to the relatively small size of the secondary containment structure.
- Sampling will be at locations where concrete joints, the trench, and the sump are located.

View the full proposal

Ecology invites you to review and comment on this proposed permit modification. This Focus Sheet is a summary of the proposed changes. See page 1 for comment period dates and information on how to submit comments. Copies of the proposed modification are available at the Administrative Record and Information Repositories listed on page 4. In addition, the proposed modification is online at https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods.

Ecology will consider and respond to all comments received during the public comment period. We will make the final permitting decision after the close of the comment period. We will publish a Response to Comments document with the issuance of the final permit.
**Hanford’s Information Repositories and Document Review Locations**

<table>
<thead>
<tr>
<th>Location</th>
<th>Address</th>
<th>Phone</th>
</tr>
</thead>
</table>
| **Seattle** | University of Washington Suzzallo Library  
P.O. Box 352900  
Seattle, WA 98195  
206-543-5597 |                |                |
| **Spokane** | Gonzaga University  
Foley Center  
502 E Boone Avenue  
Spokane, WA 99258  
509-313-6110 |                |                |
| **Oregon** | Portland State UniversityMillar Library  
1875 SW Park Avenue  
Portland, OR 97207  
503-725-4542 |                |                |

**Washington**

**Richland**
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
Phase 1a

The Washington State Department of Ecology invites you to review and comment on the draft Permit Modification and the class 3 permit modification to the Permit will be located at 200 East Recreation Drive, Richland, Washington 99352.

The permits are:

USDOE Energy Richland (USEE); DOE, P.O. Box 599, Richland, WA 99352

NRC at the Hanford Site

The Regional Permitting Office will review and comment on the permit modification to the Permit and the class 3 permit modification to the Permit will be located at 1059 East Recreation Drive, Richland, Washington 99352.

Public Comment: Please plan to attend the hearing, which is scheduled for the following date and time:

Tuesday, March 26, 2019, 10:00 a.m.


Public Comment: Please plan to attend the hearing, which is scheduled for the following date and time:

Tuesday, March 26, 2019, 10:00 a.m.


American Pump Station Piping

MATERIALS ONLY

The KID reserves the right to reject any or all bids. Please refer to the Prospect Information below for additional information.

The City of Richland is an Equal Opportunity Employer and encourages minority-owned businesses to apply.

Public Notice: Pursuant to the provisions of Title 23: Zoning Regulations of the City of Richland, the City of Richland will be holding a Planning Commission Hearing to consider an application for a zoning change.

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PUBLIC UTILITIES DISTRICT NO. 1 OF FRANKLIN COUNTY

PUBLIC NOTICE

BY SPECIAL MEETING NOTICE, the City of Pasco, Washington held a Special Meeting on Wednesday, March 13th at 8:00 p.m., in the City Council chambers at 322 3rd Avenue. The purpose of the meeting was to hear and receive input from the public regarding a formal proposal that the City enter into a Cooperation Agreement with Clark County.

Potential investors interested in the Pasco 200 East Area of the Hanford Site Storage Area were part of the Origination structure. The Origination structure has two separate components, one of which is the Origination component and the other is the Origination-Formation component. The Origination component was part of the Origination-Formation component and was used for providing procedural process to the Origination-Formation component. The Origination component was designed to be executed by an appropriate agent or agent on behalf of the Origination-Formation component. The Origination component was designed to be executed by an appropriate agent or agent on behalf of the Origination-Formation component. The Origination component was designed to be executed by an appropriate agent or agent on behalf of the Origination-Formation component. The Origination component was designed to be executed by an appropriate agent or agent on behalf of the Origination-Formation component.

ônginance: the 200 East Area of the Hanford Site Storage Area was part of the Origination structure. The Origination structure has two separate components: one of which is the Origination component and the other is the Origination-Formation component. The Origination component was part of the Origination-Formation component and was used for providing procedural process to the Origination-Formation component. The Origination component was designed to be executed by an appropriate agent or agent on behalf of the Origination-Formation component. The Origination component was designed to be executed by an appropriate agent or agent on behalf of the Origination-Formation component. The Origination component was designed to be executed by an appropriate agent or agent on behalf of the Origination-Formation component. The Origination component was designed to be executed by an appropriate agent or agent on behalf of the Origination-Formation component. The Origination component was designed to be executed by an appropriate agent or agent on behalf of the Origination-Formation component.
276-BA Organic Storage Area permit modification 30-Day Advance Notice

The Washington State Department of Ecology is providing notification of a 45-day public comment period starting early to mid-March 2019. This comment period will address proposed modifications to the Hanford Facility Resource Conservation and Recovery Act Permit, Revision 8c (Permit) for the 276-BA Organic Storage Area. The proposed changes will be located in Part IV, Closure Unit Group 32 of the Permit. The Permittees are U.S. Department of Energy Richland Operations and CH2M Hill Plateau Remediation Company. The draft class 3 permit modification was submitted to Ecology on May 4, 2016, with the first 60 day comment period held in the summer of 2016. The 276-BA Organic Storage Area is located in the northeast portion of the B Plant Complex in the 200 East Area of the Hanford Site in southeastern Washington.

What Changes are Being Proposed?

The proposed permit modification will add 276-BA Organic Storage Area Closure Plan and Permit Conditions to the Permit. The proposed draft language describes clean closure in the closure plan.

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
Hanford@ecy.wa.gov
509-372-7950

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276-BA Organic Storage Area Public Comment Period Notification

The Washington State Department of Ecology is providing notification of a 45-day public comment period starting March 11 through April 26, 2019. This comment period will address proposed modifications to the Dangerous Waste Portion for the Treatment, Storage, and Disposal of Dangerous Waste for the 276-BA Organic Storage Area. The Permittees are the U.S. Department of Energy Richland Operations (USDOE) and CH2MHill Plateau Remediation Company. The 276-BA Organic Storage Area is located on the Hanford Site in southeastern Washington.

What Changes are Being Proposed?

The Class 3 permit modification will include the following:

- Unit Specific Permit Conditions
- Addendum H, Closure Plan which proposes clean closure activities that will be completed within 180 days of the start date. USDOE initiated a Class 3 permit modification to add the 276-BA Organic Storage Area to the Permit on May 4, 2016. The 60-day public comment period as required by Washington Administrative Code (WAC) 173-303-830(4)(c) began on April 25, 2016, and ended on August 6, 2016.

Ecology issued a Letter of Incompleteness and Notice of Deficiency for the Class 3 Permit Modification Request on August 11, 2016. We resolved the deficiencies with the permittees and the permit modification to be complete. Ecology responded to comments submitted by two members of the public during that comment period. Following the comment period held in 2016, significant changes were made to the Closure Plan as part of Ecology’s completeness determination and technical review. Changes to the closure plan include the following:

- The 276-BA container was part of the B Plant Organic Mixed Waste Storage System and previously classified as a tank in the B Plant Complex Part A Form. Upon further review, USDOE determined that 276-BA ISO East should be classified as a container because it meets the RCRA definition of container in WAC-173-303-040. 276-BA ISO East will be closed under the container standards in WAC 173-303-630(10).
- In addition, the components of the United States Environmental Protection Agency 7 Step Data Quality Objectives were evaluated and identified in the Closure Plan for 276-BA Organic Storage Area.

How to Comment

Ecology invites you to review and comment on this proposed 276-BA Organic Storage Area Permit Modification. Copies of the proposed modification are located in the Administrative Record and Information Repositories. In addition, the proposed modification is online at https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods. Please submit comments by April 26, 2019. Electronic submission (preferred): http://wt.ecology.commentinput.com/?id=YPUpu

Mail or hand-deliver to:
Daina McFadden
3100 Port of Benton Blvd
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
Hanford@ecy.wa.gov
509-372-7950

For more information, contact:
Stephanie Schlief
Hanford@ecy.wa.gov
(509)372-7950

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