DOE/RL-97-03 UC-630

Hanford Facility Dangerous Waste Permit Application, Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility

Date Published July 1997



United States Department of Energy P.O. Box 550 Richland, Washington 99352

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Department of Energy

Richland Operations Office P.O. Box 550 Richland, Washington 99352

JUL 25 1997

97-FAP-576

Mr. Moses N. Jaraysi Program Manager Nuclear Waste Program State of Washington Department of Ecology 1315 West Fourth Avenue Kennewick, Washington 99336-6018

Dear Mr. Jaravsi:

CERTIFICATION OF THE HANFORD FACILITY DANGEROUS WASTE PART B PERMIT APPLICATION DOCUMENTATION, 242-A EVAPORATOR AND LIQUID EFFLUENT RETENTION FACILITY/200 AREA EFFLUENT TREATMENT FACILITY (WA7890008967) (TSD: T-2-6 AND S-2-8/T-2-8, RESPECTIVELY)

Enclosed is the Hanford Facility Dangerous Waste Permit Application documentation (Part B. Revision 1) for the 242-A Evaporator (Enclosure 1), and (Part B, Revision 0) for the Liquid Effluent Retention Facility/200 Area Effluent Treatment Facility (LERF/ETF) (Enclosure 2). The 242-A Evaporator and LERF/ETF Part Bs have been prepared for incorporation into the Hanford Facility Resource Conservation and Recovery Act Permit during Modification C.

If you have any questions, please contact Tony McKarns, U.S. Department of Energy, Richland Operations Office, on 376-9333.

Sincerely.

James E. Rasmussen, Director Environmental Assurance. Permits. and Policy Division DOE Richland Operations Office

8. m. T Trece 5

William D. Adair, Director Environmental Protection Responsible Party for Fluor Daniel Hanford, Inc.

cc w/o encls: W. Adair. FDH J. Coenenberg, WMH

FAP · ACM

Enclosures: 2 cc w/encls: R. Jim. YIN

D. Powaukee. NPT

J. Wilkinson. CTUIR

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HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION, LIQUID EFFLUENT RETENTION FACILITY AND 200 AREA EFFLUENT TREATMENT FACILITY

FOREWORD

The Hanford Facility Dangerous Waste Permit Application is considered to be a single application organized into a General Information Portion (document number DOE/RL-91-28) and a Unit-Specific Portion. The scope of the Unit-Specific Portion is limited to Part B permit application documentation submitted for individual, 'operating' treatment, storage, and/or disposal units, such as the Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility (this document, DOE/RL-97-03).

Both the General Information and Unit-Specific portions of the Hanford 17 18 Facility Dangerous Waste Permit Application address the content of the Part B 19 permit application guidance prepared by the Washington State Department of 20 Ecology (Ecology 1987 and 1996) and the U.S. Environmental Protection Agency (40 Code of Federal Regulations 270), with additional information needs 21 22 defined by the Hazardous and Solid Waste Amendments and revisions of Washington Administrative Code 173-303. For ease of reference, the Washington 23 State Department of Ecology alpha-numeric section identifiers from the permit 24 application guidance documentation (Ecology 1996) follow, in brackets, the 25 26 chapter headings and subheadings. A checklist indicating where information is 27 contained in the Liquid Effluent Retention Facility and 200 Area Effluent 28 . Treatment Facility permit application documentation, in relation to the 29 Washington State Department of Ecology guidance, is located in the Contents 30 Section. 31

Documentation contained in the General Information Portion is broader in nature and could be used by multiple treatment, storage, and/or disposal units (e.g., the glossary provided in the General Information Portion). Wherever appropriate, the Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility permit application documentation makes cross-reference to the General Information Portion, rather than duplicating text.

Information provided in this Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility permit application documentation is current as of June 1, 1997.

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345 67

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123456 PROFESSIONAL ENGINEER TANK INTEGRITY ASSESSMENT FOR THE 200 AREA EFFLUENT TREATMENT FACILITY TANK SYSTEM 4C

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9 10 BUILDING EMERGENCY PLAN FOR 200 AREA EFFLUENT TREATMENT FACILITY AND LIQUID EFFLUENT RETENTION FACILITY 7A 11 12 13

TRAINING Ŕ8

METRIC CONVERSION CHART

Into metric units

Out of metric units

· · ·						
5	If you know	Multiply by	To get	If you know	Multiply by	To get
6		Length		Length		
7	inches	25.40	millimeters	millimeters	0.0393	inches
8	inches	2.54	centimeters	centimeters	0.393	inches
9	feet	0.3048	meters	meters	3.2808	feet
10	yards	0.914	meters	meters	1.09	yards
11	miles	1.609	kilometers	kilometers	0.62	miles
12		Area			Area	
13	square	6.4516	square	square	0.155	square
14	inches		centimeters	centimeters		inches
15	square feet	0.092	square	square	10.7639	square
			meters	meters		feet
16	square	0.836	square	square	1.20	square
17	yards		meters	meters		yards
18	square	2.59	square	square	0.39	square
19	miles		kilometers	kilometers		miles
20	acres	0.404	hectares	hectares	2.471	acres
21		Mass (weight		Mass (weight)		
22	ounces	28.35	grams	grams	0.0352	ounces
23	pounds	0.453	kilograms	kilograms	2.2046	pounds
24	short ton	0.907	metric ton	metric ton	1.10	short ton
25		Volume			Volume	
26	fluid	29.57	milliliters	milliliters	0.03	fluid
27	ounces					ounces
28	quarts	0.95	liters	liters	1.057	quarts
29	gallons	3.79	liters	liters	0.26	gallons
30	cubic feet	0.03	cubic	cubic	35.3147	cubic feet
			meters	meters		
31	cubic yards	0.76456	cubic	cubic	1.308	cubic
			meters	meters		yards
32		Temperature			Temperature	
33	Fahrenheit	subtract	Celsius	Celsius	multiply	Fahrenheit
		32 then			by '	
		multiply			9/5ths,	
		by 5/9ths			then add	
					32	l
34		Force			Force	
35	pounds per	6.895	kilopascals	kilopascals	1.4504 ×	pounds per
36	square inch			1	10 ⁻⁴	sguare
					l	inch
37						

37 38 39

Source: Engineering Unit Conversions, M. R. Lindeburg, PE., Second Ed., 1990, Professional Publications, Inc., Belmont, California.

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Facility name Liquid Effluent Retention Facility/ 200 Area Effluent Treatment Facility (D0E/RL-97-03, Rev. 0)

Date Application Received _____

State of Washington Part B Permit Application Review Checklist for Treatment and Storage in Tanks and Containers				
		Technically Adequate?	Location in Application	
А.	Part A Form		Chapter 1.0	
B.	Facility Description and General Provisions		Chapter 2.0	
B-1	General Description		2.1, 2.1.1, 2.1.2	
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B-1(b)	Construction Schedule		2.1.4	
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B-2b	Additional Requirements for Land Disposal Facilities	Not Applicable	Not Applicable	
B-3	Seismic Consideration		Not Applicable	
B-4	Traffic Information		2.3	
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C-1	Chemical, Biological and Physical Analyses		3.1	
C-1a C-1b C-1c	Waste In Piles Landfilled Wastes Wastes Incinerated and Wastes Used in Performance Tests	Not Applicable	Not Applicable	
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		Technically Adequate?	Location in Application
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D-1a	Description of Containers		4.3.1

		Technically Adequate?	Location in Application
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D-1d(1)(d)	Control of Run-on		4.3.4.1.3
D-1d(2)	Removal of Liquids from Containment System		4.3.4.2
Requi Conta Exhib	nstration that Containment Is Not red Because Containers Do Not in Free Liquids, Wastes That it Ignitability or Reactivity, or es Designated F020 - 023, F026, 27		Not Applicable
	ntion of Reaction of Ignitable, ive, and Incompatible Wastes in iners		4.3.4.3
D-1f(1)	Management of Certain Reactive Wastes in Containers		4.3.4.3
D-1f(2)	Management of Ignitable and Certain Other Reactive Wastes in Containers		4.3.4.3
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		Technically Adequate?	Location in Application
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		Technically Adequate?	Location in Application
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		Technically Adequate?	Location in Application
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D-8b(1)(a)	Equipment Subject to Subpart BB		Not Applicable
D-8b(1)(b)	Re-evaluating Applicability of Subpart BB Standards		Not Applicable
D-8b(2)	Equipment Leaks - Demonstrating Compliance		Not Applicable
D-8b(2)(a)	Procedures for Identifying Equipment Location and Method of Compliance, Marking Equipment, and Ensuring Records are Up-to- date	-	Not Applicable
D-8b(2)(b)	Demonstrating Compliance with D-8b(1)(a) and (2)(a) Procedures		Not Applicable
D-8b(2)(c)	Closed Vent Systems or Control Devices: Showing Compliance with Emission Reduction Standards		Not Applicable
D-8c Tanks	s and Containers		Not Applicable

		Technically Adequate?	Location in Application
D-8c(1) Applicability of Subpart CC Standards		Not Applicable
D-8c(2) Tank Systems and Container Areas - Demonstrating Compliance		Not Applicable
D-9	Waste Minimization		Chapter 10.0
D-10	Groundwater Monitoring for Land- based Units		Chapter 5.0 Appendix 5A
E.	Releases from Solid Waste Management Units	· ·	Chapter 2.0
E-1	Solid Waste Management Units and Known and Suspected Releases of Dangerous Wastes or Constituents		Not Applicable
E-1a	Solid Waste Management Units		Not Applicable
E-1b	Releases		Not Applicable
E-2	Corrective Actions Implemented		Not Applicable
F.	Procedures to Prevent Hazards		Chapter 6.0
F-1	Security		6.1
F-1a	Security Procedures and Equipment		6.1.1
F-1b	Waiver		6.1.2
F-2	Inspection Plan		6.2
F-2a	General Inspection Requirements	1	6.2.1
F-2b	Inspection Log		6.2.3
F-2c	Schedule for Remedial Action for Problems Revealed		6.2.3
F-2d	Specific Process or Waste Type Inspection Requirements		6.2.2
F-2d(1			6.2.2.1

			Technically Adequate?	Location in Application
F-2d(2) Tank System Inspec Corrective Actions	ctions and		6.2.2.2
F-2d(2)(a) Tank System Inspec	ctions		6.2.2.2
F-2d(2)(b) Tank Systems - Con Actions	rrective		6.2.2.2
F-2d(3) Storage of Ignitable Wastes	or Reactive		6.2.4
F-2d(4) Air Emissions Cont Detection - Inspecti Monitoring, and Co Actions	ons,		Not Applicable
F-2d(4)(a) Process Vents			Not Applicable
F-2d(4)(b) Equipment Leaks			Not Applicable
F-2d(4)(c) Tanks and Containe	ers		Not Applicable
F-2d(5 F-2d(6 F-2d(7 F-2d(8 F-2d(9) Surface Impoundme Inspection) Incinerator Inspecti) Landfill Inspection	on		6.2.2.3
F-3	Preparedness and Preventio Requirements	n	···	6.3
F-3a	Equipment Requirements			6.3.1
F-3b	Aisle Space Requirement			6.3.2
F-4	Preventive Procedures, Stru Equipment	ctures, and		6.4
F-5	Prevention of Reaction of Is Reactive, and/or Incompatib		•	6.5
F-5a	Precautions to Prevent Ignit Reaction of Ignitable or Rea			6.5
F-5b	Precautions for Handling Ig Reactive Waste and Mixing Incompatible Wastes			6.5

		Technically Adequate?	Location in Application
F-5b(1)) Ignitable or Reactive Wastes In Tanks		6.5
F-5b(2)	Incompatible Wastes In Containers or Tanks		6.5
G.	Contingency Plan		Appendix 7A
G-1	General Information		Appendix 7A
G-2	Emergency Coordinators		Appendix 7A
G-3	Circumstances Prompting Implementation		Appendix 7A
G-4	Emergency Response Procedures		Appendix 7A
G-4a	Notification		Appendix 7A
G-4b	Identification of Dangerous Materials		Appendix 7A
G-4c	Hazard Assessment and Report		Appendix 7A
G-4d	Prevention of Recurrence or Spread of Fires, Explosions, or Releases		Appendix 7A
G-4f	Post-Emergency Actions		Appendix 7A
G-5	Emergency Equipment		Appendix 7A
G-6	Coordination Agreements		Appendix 7A
G-7	Evacuation Plan		Appendix 7A
G-8	Required Reports, Recordkeeping, and Certifications		Appendix 7A
G-8a	General Requirements		Appendix 7A
G-8a	Requirements for Tank Systems		Appendix 7A
Н.	Personnel Training	· ·	Appendix 8A
H-1	Job Title/Job Description		Appendix 8A

	<u></u>	Technically Adequate?	Location in Application
Н-2	Outline of Training Program		Appendix 8A
H-3	Implementation of Training Program		Appendix 8A
I.	Closure and Financial Assurance		Chapter 11.0
I-1	Closure Plan/Financial Assurance for Closure		11.1
I-1a	Closure Performance Standard		11.2
I-1b	Closure Activities		11.3
I-1b(1)	Maximum Extent of Operation		Not Applicable
I-1b(2)	Removing Dangerous Wastes		11.3.3
I-1b(3)	Decontaminating Structures, Equipment, and Soil		11.3.4
I-1b(4)	Sampling and Analysis to Identify Extent of Decontamination/ Removal and to Verify Achievement of Closure Standard		11.3.4.2 General Information Portion (DOE/RL-91-28)
I-1b(4)	(a) Sampling to Confirm Decontamination of Structures and Soils		3.4.2 General Information Portion (DOE/RL-91-28)
I-1b(5)	Other Activities		Not Applicable
I-1c	Maximum Waste Inventory		11.4
I-1d	Closure of Waste Piles, Surface Impoundments, Incinerators, Land Treatment, and Miscellaneous Units		11.5.1, 11.5.2, 11.5.3
I-1e	Closure of Landfill Units		
I-1f	Schedule for Closure		11.6, General Information Portion (DOE/RL-91-28)
I-1g	Extension for Closure Time		General Information Portion (DOE/RL-91-28)
I-1h	Closure Cost Estimate		General Information Portion (DOE/RL-91-28)

Dangerous Waste Permit Application Requirements

		Technically Adequate?	Location in Application
I-1i	Financial Assurance Mechanism for Closure		Not Applicable
I-2	Notice in Deed of Already Closed Disposal Units		Not Applicable
I-3	Post-Closure Plan		Not Applicable
I-4	Liability Requirements		Not Applicable
I-4a	Coverage for Sudden Accidental Occurrences		Not Applicable
I-4b	Coverage for Nonsudden Accidental Occurrences		Not Applicable
I-4c	Request for Variance		Not Applicable
J.	Other Federal and State Laws		Chapter 13.0
К.	Part B Certification		Chapter 14.0

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CONTENTS

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1.0 PART A [A] .

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1.0 PART A [A]

The following is a chronology of the regulatory history of the Liquid Effluent Retention Facility (LERF) and 200 Area Effluent Treatment Facility (ETF).

LERF:

9'

- On February 26, 1990, the original Hanford Facility Dangerous Waste Part A Permit Application (Part A), Form 3, Revision 0, was submitted to the Washington State Department of Ecology (Ecology).
- On June 26, 1991, the Part A, Form 3, Revision 1, added nonspecific source Dangerous Waste Number F005 to corresponded with the dangerous waste numbers from the Double-Shell Tank (DST) System and 242-A Evaporator.
- On May 17, 1993, the Part A, Form 3, Revision 2, added nonspecific source Dangerous Waste Numbers F001, F002, and F004 to corresponded with the dangerous waste numbers from the DST System and 242-A Evaporator.
- On November 4, 1994, the Part A, Form 3, Revision 3, added nonspecific source Dangerous Waste Number F003 to corresponded with the dangerous waste numbers from the DST System and 242-A Evaporator.
- On February 9, 1996, the Part A, Form 3, Revision 4, added treatment capability (for treatment of dilute aqueous waste streams from other Hanford Facility generators) pursuant to treatment surface impoundment exemption located in Title 40 Code of Federal Regulations Part 268.4
- On October 1, 1996, the Part A, Form 3, Revision 5, supported the transition of this treatment, storage, and/or disposal (TSD) unit to the new Project Hanford Management Contractor.

38 ETF:

- On June 26, 1991, the original Hanford Facility Dangerous Waste Part A, Form 3, Revision 0, was submitted to Ecology.
- On August 25, 1993, the Part A, Form 3, Revision 1, added three 2,536,000-liter verification tanks for greater-than-90 day storage and a greater-than-90 day container storage area. Also added six new dangerous waste numbers to reflect the waste that could be stored in the verification tanks and 32 new dangerous waste numbers that could be stored in the container storage area.
- On October 1, 1996, the Part A, Form 3, Revision 2, was revised to support the transition of this TSD unit to the new Project Hanford Management Contractor. Also added Dangerous Waste Number F039

(multi-source leachate). Dangerous Waste Number F039 was added to support Low-Level Burial Grounds efforts to treat, store, and/or disposal of multi-source leachate from the mixed waste trenches and from other potential sources of leachate. Please print or type in the unshaded areas only (fill-in areas are spaced for elite type, i.e., 12 character/inch).

Liquid Effluent Retention Facility Rev. 5, 10/01/96, Page 1 of 7

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III. PROCESSES (continued) C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESS (code "TO4"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACI S04 T02

The Liquid Effluent Retention Facility (LERF) began waste management operations in April of 1994. The LERF was constructed under interim status in accordance with Washington Administrative Code (WAC) 173-303. The LERF provides interim storage and treatment of the 242-A Evaporator process condensate and dilute aqueous waste streams from other Hanford Facility generating units until further treatment is conducted at the 200 Area Effluent Treatment Facility (ETF).

The LERF is a retention basin consisting of three cells (surface impoundments) (SO4). Treatment (TO2), consisting of flow and pH equalization, takes place in accordance with the treatment surface impoundment exemption (Title 40 Code of Federal Regulations, Part 268.4). Each cell has a design capacity of 24,605,000 liters (6,500,000 gallons), with a total capacity of 73,815,000 liters (19,500,000 gallons).

IV. DESCRIPTION OF DANGEROUS WASTES

- A. DANGEROUS WASTE NUMBER Enter the four digit number from Chapter 173-303 WAC for each listed dangerous waste you will handle. If you handle dangerous wastes which are not listed in Chapter 173-303 WAC, enter the four digit number(s) that describes the characteristics and/or the toxic contaminants of those dangerous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

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METRIC UNIT OF						С	OD	E
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If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D PROCESSES

1 PROCESS CODES:

For listed dangerous waste: For each listed dangerous waste entered in column A select the code(s) from the list of process codes contained in Section III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed dangerous wastes: For each charactenstic or toxic contaminant entered in Column A, select the code(s) from the list of process codes contained in Section III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed dangerous wastes that possess that charactenstic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: DANGEROUS WASTES DESCRIBED BY MORE THAN ONE DANGEROUS WASTE NUMBER - Dangerous wastes that can be described by more than one Waste Number shall be described on the form as follows:

- Select one of the Dangerous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste. 1.
- In column A of the next line enter the other Dangerous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line. 2.

Repeat step 2 for each other Dangerous Waste Number that can be used to describe the dangerous waste. 3.

EXAMPLE FOR COMPLETING SECTION IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corresive only and there will be an estimated 200 pounds per year of each waste. The other waste is corresive and ignitable and there will be an estimated 100 pounds per year of that waste is no there. Treatment will be in an incinerator and disposel will be in a landfill.

	Т								D. PROCESSES											
LINE		ANO VAS	TE	NO		B. ESTIMATED ANNUAL QUANTITY OF WASTE	1e					1.	PRO	CE: (en)	SS Ci ter)	DD	ES			2. PROCESS DESCRIPTION (if a code is not entered in D(1))
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Liquid Effluent Retention Facility Rev. 5, 10/01/96, Page 3 of 7

Continued from page 2. NOTE: Photocopy this page before completing if you have more then 26 westes to list.

	•							•									
IV.	DE	sci	RIP	TION	OF DANGEROUS WASTES (continue	d)		_							;		
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Continued from the front.

IV DESCRIPTION OF DANGEROUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM SECTION D(1) ON PAGE 3.

The LERF stores and treats the 242-A Evaporator process condensate and dilute aqueous waste streams from other Hanford Facility generating units until further treatment is conducted at the ETF. A description of the dangerous waste managed at the LERF is as follows.

The 242-A Evaporator process condensate is regulated as a mixed waste because of the "derived from" rule from treating Double-Shell Tank System waste. Double-Shell Tank System waste is a listed waste due to the presence of spent halogenated and nonhalogenated solvents (F001, F002, F003, F004, and F005). The LERF also could receive other waste streams from onsite remediation and waste management activities, which could carry the F001 through F005 dangerous waste numbers, and have the potential presence of characteristic waste (D001 through D011, D018, D019, D022, D028 through D030, D033 through D036, D038 through D041, and D043). The LERF could receive multi-source leachate (F039), which is derived from nonspecific source waste F001 through F005. The process condensate and/or other influent waste streams also could display the state-only criteria of toxicity (WT01 or WT02).

The Estimated Annual Quantity of Dangerous Waste (Section IV.B.) of 73,812,000 kilograms (162,728,000 pounds) per year is based on approximately 73,815,000 liters (19,500,000 gallons) of waste, or the total capacity of the LERF.

V. FACILITY DRAWING Refer to attached draw				
All existing facilities must include in the space prov	ided on page 5 a scale drawing of	i the facility (see instructions for	r more detail).	
VI. PHOTOGRAPHS Refer to attached pho	tograph(s).			
All existing facilities must include photographs <i>(seri</i> sites of future storage, treatment or disposal areas	(see instructions for more detail).		• • • • • • • • • • • • • • • • • • •	d disposal areas; and
VII. FACILITY GEOGRAPHIC LOCATION This i	nformation is provided on the	attached drawing(s) and pho	otograph(s).	
LATITUDE (degrees, minutes,	& seconds!	LONGITU	DE (degrees, minutes, & sec	onds)
VIII. FACILITY OWNER				
 A. If the facility owner is also the facility operatively. B. If the facility owner is not the facility operate 				ft and skip to Section IX
	• .	•		•
1. N	AME OF FACILITY'S LEGAL OWN	ER	2. PHO	NE NO. (area code & no.
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3. STREET OR P.O. BOX		4. CITY OR TOWN	6, ST.	6. ZIP CODE
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IX. OWNER CERTIFICATION			·····	
certify under penelty of law that I have personally neuiry of those individuals immediately tesponsible s here are significant penalties for submitting false ini	for obtaining the information. I be	lieve that the submitted informat	nd all attached documents, tion is true, accurate, and co	and that based on my omplete. I am aware the
NAME (print or type)	SIGNATURE	1.1	DATE SIGNED	
John D. Wagoner, Manager		11	d	21
J.S. Department of Energy	TIM N.	Namm	9/7/6/9	'la
Richland Operations Office				<u>v</u>
X. OPERATOR CERTIFICATION		the flore to the state	· · · · · · · · · · · · · · · · · · ·	
cortify under penalty of law that I have personally on nguiry of those individuals immediately responsible t here are significant penalties for submitting false init	examined and an familiar with the for obtaining the information, I be formation, including the possibility	informagen submitted in this al lieve that the submitted informat r of fine and imprisonment.	no all attached documents, tion is true, accurate, and ci	end that based on my emplete. I am aware tha
NAME (print or type)	SIGNATURE		DATE SIGNED	
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SEE ATTACHMENT				
SEEATIAGOMENT	1			

Liquid Effluent Retention Facility Rev. 5, 10/01/96, Page 5 of 7

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

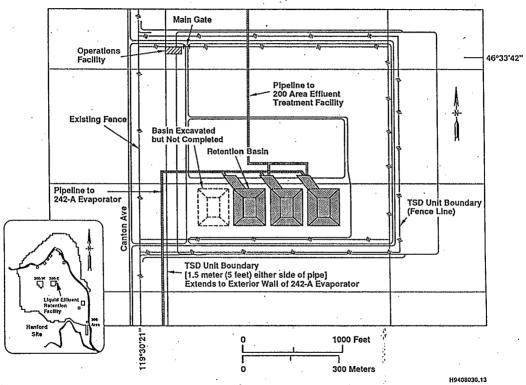
1. Waran

Owner/Operator John D. Wagoner, Manager U.S. Department of Energy Richland Operations Office

Co-operator H. J. Hatch, President and Chief Executive Officer Fluor Daniel Hanford, Inc.

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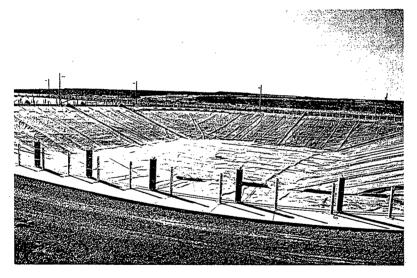
Liquid Effluent Retention Facility Site Plan



Note: To convert feet to meters, multiply by 0.3048.

Liquid Effluent Retention Facility Rev. 5, 10/01/96, Page 6 of 7

LIQUID EFFLUENT RETENTION FACILITY



TYPICAL BASIN

46°33'42" 119°30'21"

92081260-9CN (PHOTO TAKEN 1992)

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200 Area Effluent Treatment Facility Rev. 2, 10/01/96, Page 1 of 9

Please print or type in the unshaded areas only (fill-in areas are spaced for elite type, i.e., 12 character/inch).

			1. EPA/STATE I.D. NUMBER										
DANGEROUS	S WASTE PERMIT	APPLICATION	W A 7 8 9 0 0 0 8 9 6 7										
FOR OFFICIAL USE ONLY APPLICATION DATE RECEIVED													
APPLICATION DATE RECEIVED APPROVED (mo., day, & yr.)	· · · · · · · · · · · · · · · · · · ·	COMMENTS											
II. FIRST OR REVISED APPLICATION	w Imate one how only to indicate y	hathar this is the first small strain											
Place an "X" in the appropriate box in A or B below application. If this is your first application and you I.D. Number in Section I above.		TATE I.D. Number, or if this is a revis	are submitting for your facility or a revised ed application, enter your facility's EPA/STATE										
A. FIRST APPLICATION (place an "X" below and p 1. EXISTING FACILITY (See instruction		· – –											
Complete Item	below.)		V FACILITY (Complete item below)										
0 3 2 2 4 3 OPERATION BEC Use the boxes	FACILITIES, PROVIDE THE DATE // GAN OR THE DATE CONSTRUCTION to the left	no., day, & yr.) MO. D N COMMENCED	AY YR. FOR NEW FACILITIES, PROVIDE THE DATE, Imo, day, & vr/ OPERA- TION BEGAN OR IS EXPECTED TO BEGIN										
B. REVISED APPLICATION (place an "X" below an	netruction of the Hanford Engli	ty commenced	EXPECTED TO BEGIN										
X 1. FACILITY HAS AN INTERIM STATU		X 2. FAC	ILITY HAS A FINAL PERMIT										
III. PROCESSES - CODES AND CAPACITIES													
A. PROCESS CODE - Enter the code from the list o codes. If more lines are needed, enter the code process (including its design capacity) in the sp.	of process codes below that best d e(s) in the space provided. If a pro bace provided on the <i>(Section III-C)</i> .	scribes each process to be used at the sess will be used that is not included i	e facility. Ten lines are provided for entering n the list of codes below, then describe the										
B. PROCESS DESIGN CAPACITY - For each code e													
1. AMOUNT - Enter the amount.			•										
2. UNIT OF MEASURE - For each amount entere Only the units of measure that are listed belo	ed in column B(1), enter the code fa ow should be used.	om the list of unit measure codes belo	w that describes the unit of measure used.										
PRO- AP CESS ME CODE	PPROPRIATE UNITS OF EASURE FOR PROCESS DESIGN CAPACITY		PRO- APPROPRIATE UNITS OF CESS MEASURE FOR PROCESS CODE DESIGN CAPACITY										
PROCESS CODE	DESIGN CAPACITY	PROCESS Treatment:	CODE DESIGN CAPACITY										
	LONS OR LITERS	TANK	T01 GALLONS PER DAY OR										
TANK SO2 GALL WASTE PILE SO3 CUBI	LONS OR LITERS LONS OR LITERS IC YARDS OR IC METERS	SURFACE IMPOUNDMENT	LITERS PER DAY										
SON ACC IN CONDINENT SOT GALL	LONS OR LITERS	ITTERS INCIDENT OF THE OFFICIENT OF THE OFFICIENT OF THE OFFICE O											
Disposal: INJECTION WELL D80 GALL			GALLONS PER HOUR OR LITERS PER HOUR										
LANDFILL D81 ACRE	LONS OR LITERS E-FEET (the volume that Id cover one acre to a	OTHER (Use for physical, ch thermal or biological treatme	amical TO4 GALLONS PER DAY OR										
	h of one foot) HECTARE-METER ES OR HECTARES	thermal or biological treatme processes not occurring in ta surface impoundments or ind	anks, ziner-										
OCEAN DISPOSAL D83 GALL	LONS PER DAY OR RS PER DAY	ators. Describe the process the space provided; Section	es in III-C.)										
SURFACE IMPOUNDMENT D84 GALL	LONS OR LITERS	INT OF											
UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE										
GALLONSG LITERS.L CUBIC YARDS.Y CUBIC METERS.C	LITERS PER DAY TONS PER HOUR		ACRE-FEETA HECTARE-METER										
CUBIC METERS	GALLONS PER HOUF		ACRES B HECTARES Q										
EXAMPLE FOR COMPLETING SECT hold 200 gallons and the other car	TION III (shown in line numbers X-1 n hold 400 gallons. The facility als	and X-2 below): A facility has two s	torage tanks, one tank can o 20 gallons per hour.										
B. PROCESS DESIGN CA	APACITY		SS DESIGN CAPACITY										
L UI CESS	2. UNIT FOR OF MEA- OFFICIAL USE	LU CESS	2. UNIT OF MEA- SURE Colly										
L O CEBS I M CODE 1. AMOUNT N B (from list 1. specify) E E above) (specify)	SURE ONLY (enter code)												
			code)										
X-1 S 0 2 600 X-2 T 0 3 20	G E	6	╾╼╼╼╼┥╄┤┽╎┽╎┥										
0 1 817,646	V	7	╾╼╼╼╼┾┼┽┼┼┼┤										
302 7,608,654		8	╾╼╼╼┼┼┼┼┼┽┤										
³ S 0 1 147,630		9	╺─────┼┼┼┼┼┼┤										
4	╾╍┼┾╴╋╋	10											

Continued from the front.

III. PROCESSES (continued) C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESS (code *T04*). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACI

T01, S02

The 200 Area Effluent Treatment Facility (ETF) began waste management operations in November of 1995. The ETF was constructed to treat and store process condensate from the 242-A Evaporator and the Liquid Effluent Retention Facility, and other Manford Facility waste streams. The ETF is located in the northeast corner of the 200 East Area. The treatment process includes filtration, pH adjustment, ultraviolet oxidation, hydrogen peroxide decomposition, degasification, reverse osmosis, ion exchange, effluent quality verification in tanks, evaporation, concentration, and thin film drying (101). The treated effluent is stored in three verification tanks (SO2) and sampled to determine if the effluent meets recylicat discharge to the soil. If the sample analysis of the exist of the system for further treatment.

The maximum process design capacity for tank treatment is 568 liters (150 gallons) per minute or 817,646 liters (216,000 gallons) per day. The maximum process design capacity for tank storage is 7,608,654 liters (2,010,000 gallons).

S01

A secondary waste is generated during operation of the EIF. This secondary waste is concentrated into a powder, containerized, and transferred to the Central Waste Complex for storage or to the Low-Level Burial Grounds or the Environmental Restoration Disposal facility for disposal (as appropriate). Other mixed waste generated and containerized, during the operation of the EIF includes dewatered spent bead resin, spent membranes, spent filsh-efficiency particulate air cartridges, spent filter elements, spent activated carbon cartridges, and spent ultraviolet lamps. Monradioactive dangerous waste includes chemicals used in the various processes. This nonradioactive dangerous waste is containerized end transferred to an onsite treatment, storage, end/or disposal (TSD) unit or shipped offsite to a TSD facility.

The maximum process design capacity for container storage is 147,630 liters (39,600 gallons).

IV. DESCRIPTION OF DANGEROUS WASTES

- A. DANGEROUS WASTE NUMBER Enter the four digit number from Chapter 173-303 WAC for each listed dangerous waste you will handle. If you handle dangerous wastes which are not listed in Chapter 173-303 WAC, enter the four digit number(s) that describes the characteristics and/or the toxic contaminants of those dangerous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes

ENGLISH UNIT OF MEASURE CODE

METRIC UNIT C	۶F	ħ	٨	7	1	31	16	u								¢	:0	DE	
KILOGRAMS		•	•	•	•	•	ł	•	:	•	:	:	:	:	:	:	:	ĸ	

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

8081

1. PROCESS CODES:

For listed dangerous waste: For each listed dangerous waste entered in column A select the code(s) from the list of process codes contained in Section III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed dengerous wastes: For each characteristic or toxic contaminant entered in Column A, select the code(s) from the list of process codes contained in Section III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed dangerous wastes that possess that characteristic or toxic contaminant.

- Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of item (V-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).
- 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: DANGEROUS WASTES DESCRIBED BY MORE THAN ONE DANGEROUS WASTE NUMBER - Dangerous wastes that can be described by more than one Waste Number shall be described on the form as follows:

- Select one of the Dangerous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other Dangerous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other Dangerous Waste Number that can be used to describe the dangerous waste.

EXAMPLE FOR COMPLETING SECTION IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 800 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two westes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of this waste. Treatment will be in an incinerator and disposal will be in a lendfill.

	Γ									1											D. PROCESSES
LINC	W	A. DANGROUS WASTE NO. (enter code)		C. UNIT OF MEA- SURE (enter code)		r	1. PROCESS CODES											2. PROCESS DESCRIPTION (if a code is not entered in D11))			
X-1	ĸ	0	1	6	4	900	Γ	P		7 0	3	D	18	0		1	1			1	
X-2	D	0	1	0	2	400	Γ	P		7 0	,13	٥	8	6		1	Т			1	· · · · · · · · · · · · · · · · · · ·
X-3	D	0		0	1	100		P		7 0	, 3	D	8	0		Г	Г		1	1	
X-4	D	6	,†,	0	2		Γ			TIC	, 3	D	8	10	Γ	T	Т			1.	included with above

200 Area Effluent Treatment Facility Rev. 2, 10/01/96, Page 3 of 9 .

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Continued from page 2. NOTE: Photocopy this page before completing if you have more than 26 wastes to list. DesUMBER (antered from page 1)

IV. DESCRIPTION OF DANGEROUS WASTES (continu	ued)		
	C. UNIT		D. PROCESSES
L N DANGEROUS N O WASTE NO. E (onter code)	C. UNIT OF MEA- SURE (enter code)	1. PROCESS CODES	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
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2 through			
³ D 0 1 1			
4 D 0 1 8			
⁵ D 0 1 9			
⁶ D O 2 2			
7 D 0 2 8			
8 through			
⁹ D 0 3 0			
10 0 3 3			
through			
¹² D 0 3 6			
¹³ D 0 3 8			
14 through			
¹⁵ D 0 4 1	┤┤╢╎		4.4 · · · ·
¹⁶ D O 4 3			
¹⁷ F 0 0 1			
18 through			
¹⁹ F 0 0 5			
²⁰ F 0 3 9			
²¹ W T 0 1			
²² W T 0 2	¥.		Included With Above
²³ D 0 0 1 30,433,326	к		Storage-Tank
rough	┥╢╽		
²⁵ D O 1 1			
²⁶ D 0 1 8			₩

200 Area Effluent Treatment Facility Rev. 2, 10/01/96, Page 4 of 9

Continued from page 2. NOTE: Photocopy this page before completing if you have more than 26 westes to list.

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IV.	DË	SCF	RIPT		OF DANGEROUS WASTES (continue	id)			r								
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200 Area Effluent Treatment Facility Rev. 2, 10/01/96, Page 5 of 9

Continued from page 2.

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	_			N OF DANGEROUS WAST	TES (continue)	d)											
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PAGE 3 OF 5 CONTINUE ON REVERSE

Continued from the front.

IV.	DESCRIPTION	OF DANGEROUS	WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM SECTION D(1) ON PAGE 3.

The ETF stores and treats the 242-A Evaporator process condensate and other dilute, aqueous waste streams from the Hanford Facility. A description of the dangerous and/or mixed waste managed at the ETF is as follows.

The 242-A Evaporator process condensate is regulated as a mixed waste because of the "derived from" rule from treating Double-Shell Tank (DST) System waste. The DST System waste is a listed waste due to the presence of spent halogenated and nonhalogenated solvents (F001, F002, F003, F004, and F005). The ETF also could treat other waste streams from onsite remediation and waste management activities, which could carry the F001 through F005 dangerous waste numbers; the waste stream also could have the potential presence of characteristic waste (D001 through D011, D018, D019, D022, D022 through D033, D033 through D036, D038 through D041, and D043). The ETF could treat multi-source leachate (F039) that is derived from nonspecific source waste F001 through F005. The process condensate and/or other influent waste streams also could display the state-only criteria of toxicity (WT01 or WT02).

The secondary waste stream also could be regulated as a dangerous waste because of the "derived from" rule for listed waste (F001 through F005, and F039 derived from F001 through F005), and because of the potential presence of characteristic waste (D001 through D011, D018, D019, D022, D028 through D030, D033 through D036, D038 through D041, and D043), and could display the state-only criteria for toxicity (MT01 or WT02).

The 'Estimated Annual Quantity of Waste' listed under Section I.V.B. was based on an operating schedule of 365 days a year. This basis was used to provide a maximum estimated annual quantity of waste that could be treated and stored by the ETF.

							L L
V. FACILITY DRAWING Refer to attached drawing(s).						÷	
All existing facilities must include in the space provided on t	page 5 a scale drawing of	the facility (see inst	uctions for more det	e//).			-
VI. PHOTOGRAPHS Refer to attached photograph	(3).						
All existing facilities must include photographs (aeriel or gro sites of future storage, treatment or disposal areas (see insi	und-level) that clearly del ructions for more detail).	ineate all existing str	ictures; existing stor	sgo, treatry	ent and dispos	al areas; and	
VII. FACILITY GEOGRAPHIC LOCATION This information	tion is provided on the	attached drawing(s) and photograph	(s).			
LATITUDE (degrees, minutes, & secon	del		LONGITUDE (degree		A		
	<i>y</i> 3						
VIII. FACILITY OWNER							_
 A. If the facility owner is also the facility operator as list below. B. If the facility owner is not the facility operator as list 				the box to	o the left and si	kip to Section	IX
1 NAME OF	FACILITY'S LEGAL OWN	50		<u> </u>	DUONE NO	(
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IX. OWNER CERTIFICATION		,		11			
l certify under penelty of law that I have personally examine inquiry of those individuals immediately responsible for obtai there are significant penalties for submitting faise information	ning the information. I be	liave that the submitt	ed information is true	ched docu , accurate,	ments, end thet , and complete.	based on my I am ewere t	that
NAME (print or type)	SIGNATURE /			DATE SI	GNED /		
John D. Wagoner, Manager				1 11	1 alar		1
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X. OPERATOR CERTIFICATION				-	-		_
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X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Varon Owner/Operator

John D. Wagoner, Manager U.S. Department of Energy Richland Operations Office

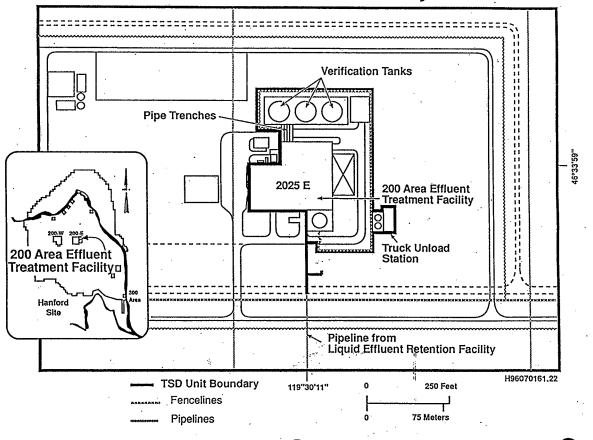
Co-operator

H. J. Hatch, President and Chief Executive Officer Fluor Daniel Hanford, Inc.

26/96

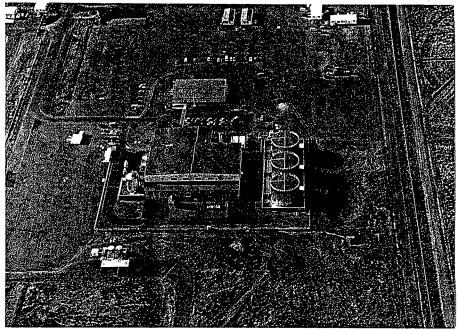
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200 Area Effluent Treatment Facility Site Plan



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200 AREA EFFLUENT TREATMENT FACILITY



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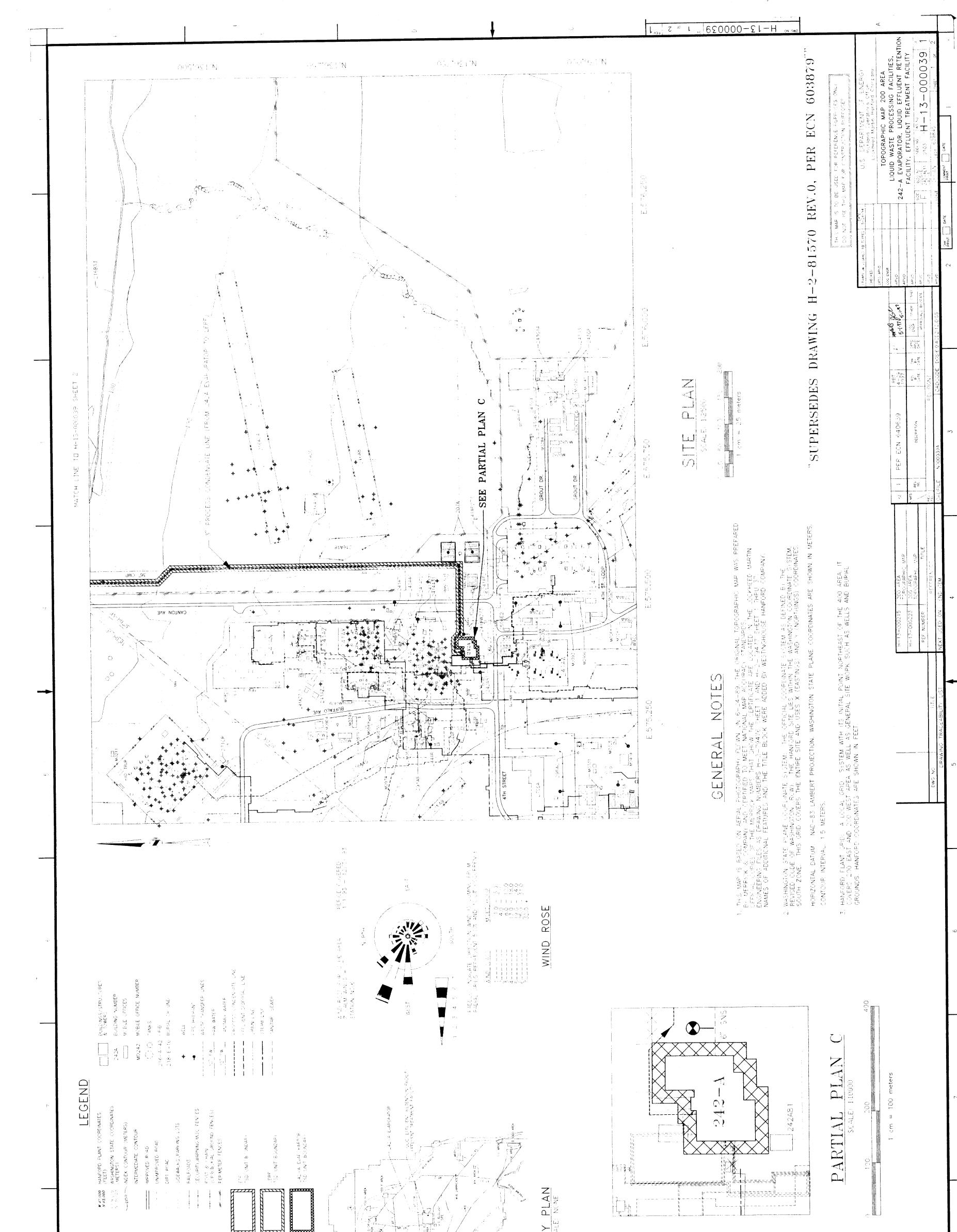
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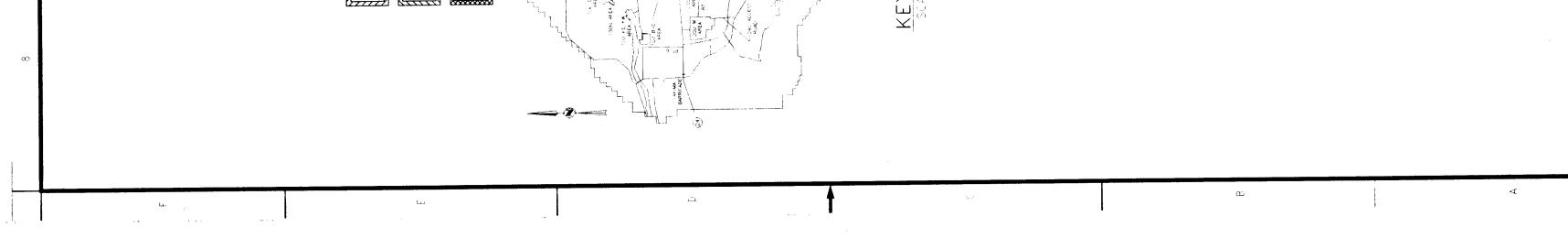
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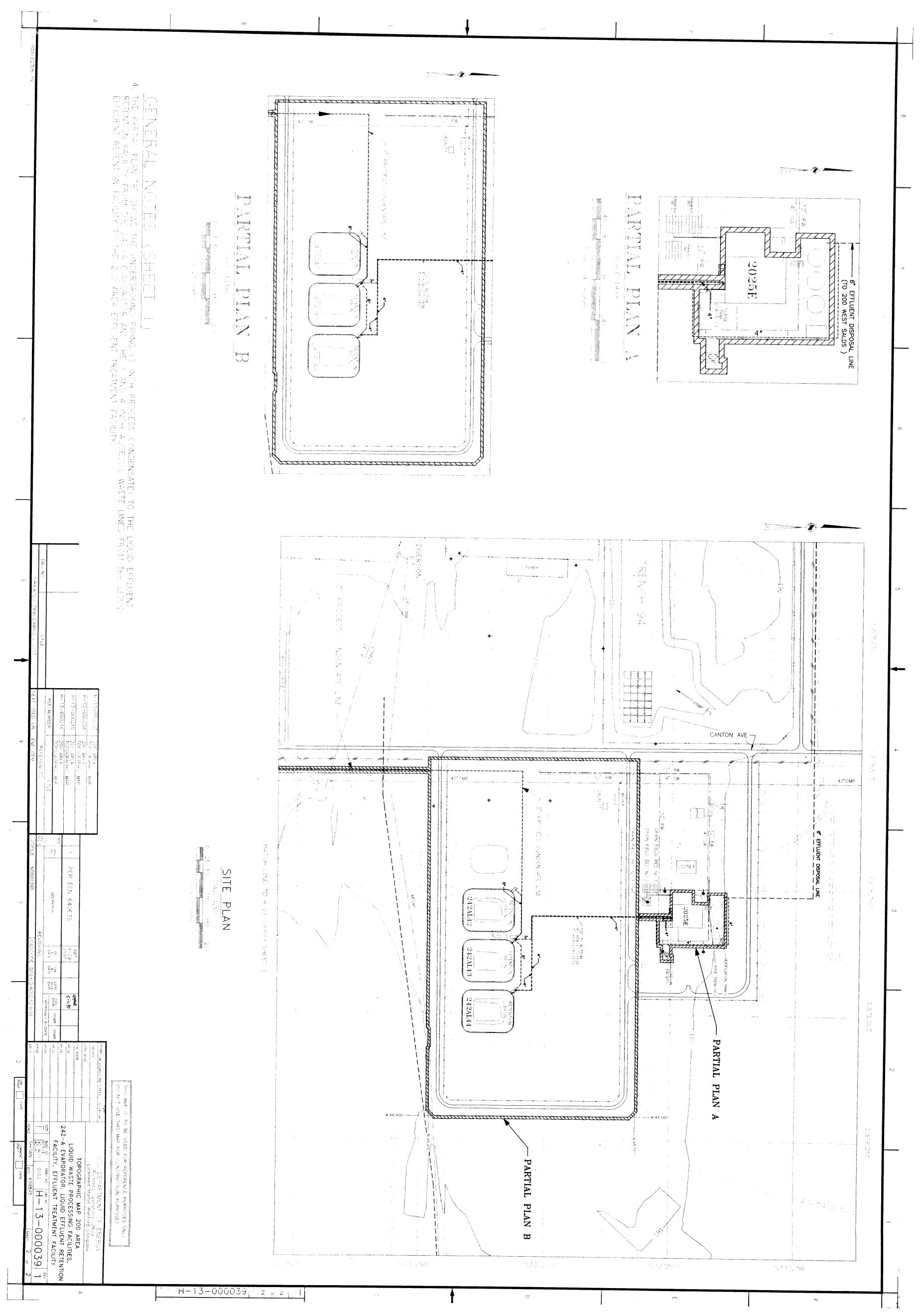
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2.0 FACILITY DESCRIPTION AND GENERAL PROVISIONS [B AND E]

The LERF and the ETF, located in the 200 East Area, are two units of an aqueous waste treatment system. Dangerous and mixed aqueous waste streams as well as nondangerous aqueous waste streams are stored and treated in the LERF and the ETF. Aqueous waste is generated from various Hanford Facility waste management and remediation activities. The term 'effluent' in this document refers to the treated aqueous waste that is discharged from the ETF.

2.1 DESCRIPTION OF THE LIOUID EFFLUENT RETENTION FACILITY AND 200 AREA EFFLUENT TREATMENT FACILITY

The following sections provide general description of the LERF and the ETF and their process components. A more detailed discussion of the waste types treated and stored and the identification of processes and equipment are provided in Chapters 3.0 and 4.0, respectively. Because dangerous waste does not include the source, special nuclear, and by-product material components of 20 mixed waste, radionuclides are not within the scope of this permit application documentation. The information on radionuclides is provided only for general knowledge.

2.1.1 Liquid Effluent Retention Facility

The LERF is composed of three surface impoundments, or basins, with a 28 nominal capacity of 24.6 million liters each (Chapter 1.0). The LERF provides 29 interim storage and treatment until the waste is transferred to the ETF for 30 final treatment. Treatment at the LERF consists of flow and pH equalization. consistent with the surface impoundment treatment exemption (40 CFR 268.4).

33 The LERF basins are provided with primary and secondary composite liners, 34 a leachate collection and removal system between the liners, and a floating 35 cover. The LERF also includes piping and pumping systems, utilities, and a 36 basin operations structure. Aqueous waste from the LERF is transferred to the 37 ETF via pipelines. 38

40 2.1.2 200 Area Effluent Treatment Facility 41

42 The ETF is a flexible treatment unit that destroys or removes 43 contaminants in an aqueous waste. Aqueous waste is transferred to the ETF 44 through pipelines connected to the LERF or from the load-in station, located 45 just east of the ETF. The Load-In Station currently consists two 25,898 liter storage tanks and a transfer pipeline that connects to the LERF/ETF transfer 46 pipeline. 47 48

49 The ETF consists of a series of treatment or process units that remove or 50 destroy essentially all of the dangerous waste and radioactive constituents, 51 except tritium. The treatment units are grouped into either the primary or 52 secondary treatment train. The major treatment units are located in the

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1 2 3	primary treatment train. The primary treatment train consists of the following units:
4 5 6 7 8 9 10 11 12 13 14	 Surge tank Rough filter Ultraviolet light/oxidation (UV/OX) pH adjustment Hydrogen peroxide decomposer Fine filter Degasification Reverse osmosis (RO) Polisher [ion exchange (IX) column] Final pH adjustment and verification.
15 16 17	Contaminants are concentrated and dried to a powder in the secondary treatment train. The secondary treatment train includes the following units:
18 19 20 21 22 23	 Secondary waste receiving tanks ETF evaporator (forced circulation evaporator) Concentrate tank Thin film dryer Container handling Supporting systems.
24 25 26 27 28 29 30 31 32	The dry powder waste generated from the treatment process is containerized and transferred to the appropriate treatment, storage, and/or disposal (TSD) unit. The treatment process also generates a maintenance and operations waste stream that includes such waste as dewatered spent resin, spent filter media, RO membranes, and UV lamps. The maintenance and operations waste stream also is containerized and transported to the appropriate TSD unit.
32 33 34 35 36 37 38 39 40 41	The treated effluent is contained in verification tanks where the effluent is sampled and held until the analytical results confirm that the effluent meets the 'delisting' criteria. Under 40 CFR 261, Appendix IX, Table 2, the treated effluent from the ETF is a 'delisted' waste; that is, the treated effluent is no longer a dangerous or hazardous waste subject to the hazardous waste management requirements of the <i>Resource Conservation and Recovery Act</i> (RCRA) <i>of 1976</i> , as amended.
42	2.1.3 Other Environmental Permits
43 44 45 46 47 48	All environmental permits that are required to support operation of the LERF and ETF are identified in the <i>Annual Hanford Site Environmental Permitting Status Report</i> (e.g., DOE/RL-96-63).
49 50	2.1.4 Construction Schedule
50 51 52	Any proposed new construction will be managed as described in the Hanford Facility RCRA Permit.

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2.2 TOPOGRAPHIC MAP [B-2]

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Topographic map (Drawing H-13-00039) is located in Appendix 2A.

2.3 ROADWAY TRAFFIC TO LIQUID EFFLUENT RETENTION FACILITY AND 200 AREA EFFLUENT TREATMENT FACILITY [B-4]

General traffic information for the Hanford Facility is presented in the General Information Portion (DOE/RL-91-28).

Three 6.1-meter-wide roads were built for the LERF. An asphalt perimeter road circumscribes the LERF inside the operational security fence. A gravel road was constructed around the 200 East Area limited access perimeter fence. A second gravel service road running north and south through the area was constructed to connect with the perimeter service road. Vehicle access to the ETF is by a paved road running east from Canton Avenue. Traffic volume on these roads is light.

2.4 RELEASE FROM SOLID WASTE MANAGEMENT UNITS [E]

Information concerning releases from solid waste management units is discussed in the General Information Portion (DOE/RL-91-28). However, no known releases have been detected from the LERF since the installation of the groundwater monitoring network (refer to Chapter 5.0).

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•	AND 200 AREA EFFLUENT TREATMENT FACILITY APP 3A-i

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3.0 WASTE ANALYSIS [C]

This chapter provides information on the chemical, biological, and physical characteristics of the aqueous waste treated and stored at LERF and ETF. The information includes waste descriptions, designations, and a waste analysis plan (Appendix 3A) for the treatment and storage of waste.

3.1 CHEMICAL, BIOLOGICAL, AND PHYSICAL ANALYSIS [C-1]

This section describes the chemical, biological, and physical characteristics of the aqueous waste treated and stored at LERF and ETF, including the following:

- A description of the waste types
- A description of the dangerous and/or mixed waste characteristics and a basis for the designation of the waste as dangerous or mixed waste.

Information on sampling methods is provided in the waste analysis plan (Appendix 3A).

3.1.1 Characteristics of Waste Treated at the Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility

The LERF and ETF store and treat 242-A Evaporator process condensate and other aqueous waste streams from onsite waste management and remediation activities. A description of the waste types managed at the LERF and ETF is located in Chapter 1.0.

3.1.2 Characteristics of Waste Streams Generated at the 200 Area Effluent Treatment Facility

The ETF generates a treated effluent stream that is contained in verification tanks. The treated effluent is sampled and held in these tanks until analytical results verify that the effluent meets the 'delisting' criteria (40 CFR 261, Appendix IX, Table 2). Following verification, the treated effluent is released as a nondangerous waste to a disposal site in the 200 West Area.

Two nonaqueous waste streams are generated during the operation of ETF: a waste stream from the treatment process and a waste stream from maintenance and operations activities. The ETF treatment process removes contaminants from an aqueous waste. These contaminants and treatment by-products are concentrated into a powder, containerized, and transferred to the Central Waste Complex (CWC) for storage or to the Low-Level Burial Grounds (LLBG) or the Environmental Restoration Disposal Facility for disposal (as appropriate).

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Waste generated from maintenance and operations activities could include, but is not limited to, dewatered spent bead resin, spent membranes, spent high-efficiency particulate air (HEPA) cartridges, spent filter elements, spent activated carbon cartridges, and spent ultraviolet lamps. Nonradioactive dangerous waste from maintenance and operations activities could include chemicals used in the various processes (Chapter 2.0). The maintenance and operations waste is containerized and transferred to an onsite TSD unit, or if nonradioactive, shipped offsite to a TSD facility.

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3.2 WASTE ANALYSIS PLAN [C-2]

13The Waste Analysis Plan for Liquid Effluent Retention Facility and14200 Area Effluent Treatment Facility is provided in Appendix 3A.

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4.0 PROCESS INFORMATION [D]

This chapter provides a detailed discussion of the LERF and ETF processes and equipment. The LERF and ETF comprise an aqueous waste treatment system located in the 200 East Area that provides storage and treatment for a variety of aqueous radioactive and/or mixed waste. This aqueous waste includes process condensate from the 242-A Evaporator and other aqueous waste generated from onsite remediation and waste management activities.

The LERF consists of three lined surface impoundments, or basins. Aqueous waste from LERF is pumped to the ETF for treatment in a series of 13 process units, or systems, that remove or destroy essentially all of the dangerous waste and radioactive constituents except tritium. The treated 14 15 effluent is discharged to a State-Approved Land Disposal Site (SALDS) north of the 200 West Area, under the authority of a Washington State Waste Discharge Permit (Ecology 1995a) and the Final Delisting (40 CFR 261. Appendix IX. Table 2).

4.1 LIQUID EFFLUENT RETENTION FACILITY PROCESS DESCRIPTION

Each of the three LERF basins has an operating capacity of 24.6-million liters. The LERF receives aqueous waste through several inlets including the following:

- A pipeline that connects LERF with the 242-A Evaporator
- A pipeline from the 200 West Area
- A pipeline that connects LERF to the Load-In Station at the ETF
- A series of sample ports located at each basin.

32 Figure 4-1 presents a general layout of LERF and associated pipelines. 33 Engineering drawings for LERF are referenced in Section 4.5 and provided in 34 Appendix 4Å. 35

36 Aqueous waste from LERF is pumped to the ETF through one of two 37 double-walled fiberglass transfer pipelines. Effluent from the ETF also can 38 be transferred back to the LERF through one of these transfer pipelines. 39 These pipelines are equipped with leak detection located in the annulus 40 between the inner and outer pipes. In the event that these leak detectors are 41 not in service, the pipelines are visually inspected during transfers for 42 leakage by opening the secondary containment drain lines at the ETF end of the 43 transfer pipelines.

45 Each basin is equipped with six available sample risers constructed of 46 6-inch perforated pipe. A seventh sample riser in each basin is dedicated to 47 influent aqueous waste receipt piping (except for aqueous waste received from the 242-A Evaporator), and an eighth riser in each basin contains liquid level 48 49 instrumentation. Each riser extends along the sides of each basin from the 50 top to the bottom of the basin and allow samples to be collected from any 51 depth. Personnel access to these sample ports is from the perimeter area of 52 the basins.

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A catch basin is provided at the northwest corner of each LERF basin for aboveground piping and manifolds for transfer pumps. Aqueous waste from the 242-A Evaporator is transferred through piping that ties into piping at the catch basins. Under routine operations, a submersible pump is used to transfer aqueous waste from a LERF basin to the ETF for processing or for basin-to-basin transfers. This pump is connected to a fixed manifold on one of four available risers.

9 Each basin consists of a multilayer liner system supported by a concrete 10 anchor wall around the basin perimeter and a soil-bentonite clay underlayment. 11 The multilayer liner system consists of a primary liner in contact with the 12 aqueous waste, a layer of bentonite carpet, a geonet, a geotextile, a gravel layer, and a secondary liner that rests on the bentonite underlayment. Any 13 aqueous waste leakage through the primary liner flows through the geonet to a 14 leachate collection system. The leachate flows to a sump at the northwest 15 corner of each basin, where the leachate is pumped up the sideslope and back 16 into the basin above the primary liner. Each liner is constructed of 17 18 high-density polyethylene. A floating cover made of very low-density 19 polyethylene is stretched over each basin above the primary liner. These covers serve to keep unwanted material from entering the basins, and to 20 21 minimize evaporation of the liquid contents. 22

24 4.2 EFFLUENT TREATMENT FACILITY PROCESS DESCRIPTION

The ETF is designed as a flexible treatment system that provides treatment for contaminants anticipated in process condensate and other onsite aqueous waste. The design influent flow rate into the ETF is approximately 570 liters per minute with planned outages for activities such as maintenance on the ETF systems. Maintenance outages typically are scheduled between treating a batch of aqueous waste, referred to as treatment campaigns. The effluent flow (or volume) is equivalent to the influent flow (or volume).

The ETF generally receives aqueous waste directly from the LERF. However, aqueous waste also can be transferred from the Load-In Station to the ETF. Aqueous waste is treated and stored in the ETF process area in a series of tank systems, referred to as process units. Within the ETF, waste also is stored in containers. Figure 4-1 provides the relative locations of the process and container storage areas within the ETF.

41 The process units are grouped in either the primary or the secondary treatment train. The primary treatment train provides for the removal or 42 destruction of contaminants. Typically, the secondary treatment train 43 processes the waste by-products from the primary treatment train by reducing 44 the volume of waste. In the secondary treatment train, contaminants are 45 concentrated and dried to a powder. The liquid fraction is routed to the 46 primary treatment train. Figure 4-2 provides an overview of the layout of the 47 ETF (2025E Building). Figure 4-3 presents the ETF floor plan, the relative 48

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locations of the individual process units and associated tanks within the ETF, and the location of the Load-In Station.

The dry powder waste and maintenance and operations waste are containerized and stored in the container storage area or in collection areas. Secondary containment is provided for all containers and tank systems (including ancillary equipment) housed within the ETF. The trenches and floor of the ETF comprise the secondary containment system. The floor includes approximately a 15.2-centimeter rise (berm) along the containing walls of the process and container storage areas. Any spilled or leaked material from within the process area or container storage area is collected into trenches that feed into either sump tank 1 or sump tank 2. From these sump tanks, the spilled or leaked material (i.e., waste) is fed to either the surge tank and processed in the primary treatment train or the secondary waste receiving tanks and processed in the secondary treatment train. All tank systems outside of the ETF are provided with a secondary containment system.

In the following sections, several figures are provided that present general illustrations of the treatment units and the relation to the process. Detailed drawings of the ETF are provided in Appendix 4B.

4.2.1 Load-In Station

25 The ETF receives aqueous waste from LERF or the Load-In Station. The ETF Load-In Station, located due east of the surge tank and outside of the perimeter fence (Figure 4-3), was designed and constructed to provide the 27 28 capability to unload, store, and transfer aqueous waste to the ETF or LERF 29 from tanker trucks, and potentially other containers (such as drums). The 30 Load-In Station consists of two load-in tanks, transfer pumps, level instrumentation for tanker trucks, leak detection capabilities for the 32 containment basin and transfer line, and an underground transfer line that 33 connects to either the ETF or LERF. 34

35 Currently, tanker trucks are used to unload aqueous waste at the Load-In 36 Station. A tanker truck is positioned on a truck pad, a 'load-in' transfer 37 line is connected to the truck, and the tanker contents are pumped into one of the Load-In Station tanks or directly to the LERF. Any leaks at the Load-In 38 Station drain to the sump. A leak detector in the sump alarms locally and in 39 the ETF control room. Alternatively, leaks can be visually detected. 40

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43 4.2.2 Effluent Treatment Facility Operating Configuration

45 Because the operating configuration of the ETF can be adjusted or 46 modified, most aqueous waste streams can be effectively treated to below 47 Delisting and Discharge Permit limits. The operating configuration of the ETF depends on the unique chemistry of an aqueous waste stream(s). Before an 48 aqueous waste stream is accepted for treatment, the waste is characterized and 49 50 evaluated. Information from the characterization is used to adjust the 51 treatment process or change the configuration of the ETF process units, as

1 necessary, to optimize the treatment process for a particular aqueous waste 2 stream. 3

4 Typically, an aqueous waste is processed first in the primary treatment 5 train, where the ETF is configured to process an aqueous waste through the 6 UV/OX unit first, followed by the RO unit. However, under an alternate 7 configuration, an aqueous waste could be processed in the RO unit first. For 8 example, high concentrations of nitrates in an aqueous waste might interfere 9 with the performance of the UV/OX. In this case, the ETF could be configured 10 to process the waste in the RO unit before the UV/OX unit.

The flexibility of the ETF also allows for some aqueous waste to be processed in the secondary treatment train first. For example, for small volume aqueous waste with high concentrations of some anions and metals, the approach could be to first process the waste stream in the secondary treatment train. This approach would prevent premature fouling or scaling of the RO unit. The liquid portion (i.e., untreated overheads from the ETF evaporator and thin film dryer) would be sent to the primary treatment train.

Figures 4-4 and 4-5 provide example process flow diagrams for two different operating configurations.

24 4.2.3 Primary Treatment Train

The primary treatment train consists of the following units:

• Surge tank - inlet, surge capacity

Filtration – for suspended solids removal

- UV/OX organic destruction
- pH adjustment waste neutralization

• Hydrogen peroxide decomposition - removal of excess hydrogen peroxide

- Degasification removal of carbon dioxide
- RO removal of dissolved solids and radionuclides
- IX removal of dissolved solids and radionuclides

Verification – holding tanks during verification.

Each of the primary treatment train process units and ancillary systems provides treatment for removal or destruction of various constituents. The primary treatment train units are operated as needed in different configurations, as determined by the characteristics of an aqueous waste stream, to protect ETF equipment and to meet discharge requirements.

Influent Receipt/Surge Tank. Depending on the configuration of the ETF, 44 the surge tank is one inlet used to feed an aqueous waste into the ETF for 45 treatment. In Configuration 1 (Figure 4-4), the surge tank is the first 46 component downstream of the LERF. The surge tank provides a storage/surge volume for chemical pretreatment and controls feed flow rates from the LERF to 47 48 the ETF. However, in Configuration 2 (Figure 4-5), aqueous waste from LERF is 49 fed directly into the treatment units. In this configuration, the surge tank 50 receives aqueous waste that has been processed in the RO units and provides 51 the feed stream to the remaining downstream process units. In yet another 52

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configuration, some small volume aqueous waste could be received into the secondary treatment train first for processing. In this case, the aqueous 2 3 waste would be received directly into the secondary waste receiving tanks. 4 Finally, the surge tank also receives waste extracted from various systems 5 within the primary and secondary treatment train while in operation. 6

7 The surge tank is located outside the ETF on the south side. In the 8 surge tank (Figure 4-6), the pH of an aqueous waste is adjusted using the 9 metered addition of sulfuric acid and sodium hydroxide, as necessary, to 10 prepare the waste for treatment in downstream processes. In addition, hydrogen peroxide or biocides could be added to control biological growth in 11 12 the surge tank. A pump recirculates the contents in the surge tank, mixing 13 the chemical reagents with the waste to a uniform pH. 14

15 Filtration. Two primary filter systems remove suspended particles in an 16 aqueous waste: a rough filter removes the larger particulates, while a fine 17 filter removes the smaller particulates. The location of these filters 18 depends on the configuration of the primary treatment train. However, the 19 filters normally are located upstream of the RO units. 20

The solids accumulating on these filter elements are backwashed to the secondary waste receiving tanks with pulses of compressed air and water, forcing water back through the filter. The backwash operation is initiated either automatically by a rise in differential pressure across the filter or manually by an operator. The filters are cleaned chemically when the backwashing process does not facilitate acceptable filter performance.

28 Auxiliary fine and rough filters (e.g., disposable filters) have been 29 installed to provide additional filtration capabilities. Depending on the 30 configuration of the ETF, the auxiliary filters are operated either in series with the primary filters to provide additional filtration or in parallel, instead of the primary fine and rough filters, to allow cleaning of the 32 33 primary fine and rough filters while the primary treatment train is in 34 operation. 35

36 Ultraviolet Light/Oxidation. Organic compounds contained in an aqueous 37 waste stream are destroyed in the UV/OX system (Figure 4-7). Hydrogen 38 peroxide is mixed with the waste. The UV/OX system uses the photochemical 39 reaction of UV light on hydrogen peroxide to form hydroxyl radicals and other 40 reactive species oxidize the organic compounds. The final products of the 41 complete reaction are carbon dioxide, water, and inorganic ions. 42

43 Organic destruction is accomplished in two UV/OX units operating in 44 parallel. During the UV/OX process, the aqueous waste passes through reaction 45 chambers where hydrogen peroxide is added. While in the UV/OX system, the 46 temperature of an aqueous waste is monitored. Should the temperature of the 47 waste exceed the upper limits for the UV/OX or RO systems, heat exchangers are 48 used to reduce the temperature of the waste. 49

pH Adjustment. The pH of a waste stream is monitored and controlled at different points throughout the treatment process. Within the primary treatment train, the pH of a waste can be adjusted with sulfuric acid or

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1 sodium hydroxide to optimize operation of downstream treatment processes or adjusted before final discharge. For example, the pH of an aqueous waste would be adjusted in the pH adjustment tank after the UV/OX process and before the RO process. In this example, pH is adjusted to cause certain chemical species such as ammonia to form ammonium sulfate, thereby increasing the rejection rate of the RO.

8 Hydrogen Peroxide Decomposition. Typically, hydrogen peroxide added into the UV/OX system is not consumed completely by the system. Because hydrogen 9 peroxide is a strong oxidizer, the residual hydrogen peroxide from the UV/OX 10 11 system is removed to protect the downstream equipment. The hydrogen peroxide 12 decomposer uses activated carbon to break down the hydrogen peroxide that is 13 not consumed completely in the process of organic destruction. The aqueous waste is sent through a column of fluidized activated carbon that breaks down 14 15 the hydrogen peroxide into water and oxygen. The gas generated by the 16 decomposition of the hydrogen peroxide is vented to the vessel offgas system. 17

Degasification. The degasification column is used to purge dissolved carbon dioxide from the aqueous waste to reduce the carbonate loading to downstream dissolved solids removal processes within the ETF primary treatment train. The purged carbon dioxide is vented to the vessel offgas system.

23 Reverse Osmosis. The RO system (Figure 4-8) uses pressure to force clean water molecules through semi-permeable membranes while keeping the larger 24 25 molecule contaminants, such as dissolved solids, radionuclides, and large molecular weight organic materials, in the membrane. The RO process uses a 26 27 staged configuration to maximize water recovery. The process produces two 28 separate streams, including a clean 'permeate' and a concentrate (or retentate), which are concentrated as much as possible to minimize the amount 29 30 of secondary waste produced. 31

32 The RO process is divided into first and second stages. Aqueous waste is 33 fed to the first RO stage from the RO feed tank. The secondary waste 34 receiving tanks of the secondary treatment train receive the retentate removed 35 from the first RO stage, while the second RO stage receives the permeate (i.e., 'treated' aqueous waste from the first RO stage). In the second RO 36 37 stage, the retentate is sent to the first stage RO feed tank while the 38 permeate is sent to the IX system or to the surge tank, depending on the 39 configuration of the ETF. 40

Two support systems facilitate this process. An anti-scale system injects scale inhibitors as needed into the feed waste to prevent scale from forming on the membrane surface. A clean-in-place system using cleaning agents, such as descalants and surfactants, cleans the membrane pores of surface and subsurface deposits that have fouled the membranes. 46

47 Ion Exchange. Because the RO process removes most of the dissolved 48 solids in an aqueous waste, the IX process (Figure 4-9) act as a polishing 49 unit. The IX system consist of three columns containing beds of cation and/or 50 anion resins. This system is designed to allow for regeneration of resins and 51 maintenance of one column while the other two are in operation. Though the two columns generally are operated in series, the two columns also can be operated in parallel or individually.

Typically, the two columns in operation are arranged in a primary/secondary (lead/lag) configuration, and the third (regenerated) column is maintained in standby. When dissolved solids breakthrough the first IX column and are detected by a conductivity sensor, this column is removed from service for regeneration, and the second column replaces the first column and the third column is placed into service. The column normally is regenerated using sulfuric acid and sodium hydroxide. The resulting regeneration waste is collected in the secondary waste receiving tanks.

Should regeneration of the IX resins become inefficient, spent resins are 14 transferred into a disposal container. The container is designed to provide dewatering with remote monitoring of the resin and water levels within the container. Displaced air from the vessels is exhausted through an entrainment separator (to remove water drops) and a high-efficiency particulate air filter and into the vessel offgas system. Free water is removed from the container and returned to the surge tank. Dewatered resins are transferred to a final storage/disposal point.

Verification. The three verification tanks (Figure 4-10) are used to hold the treated effluent while a determination is made that the effluent meets discharge limits. Should a treated effluent not meet Discharge Permit or Final Delisting requirements, the effluent can be returned to the primary treatment train for additional treatment or to the LERF.

The three verification tanks alternate between three operating modes: receiving treated effluent, holding treated effluent during laboratory analysis and verification, or discharging verified effluent. Treated effluent 30 may also be returned to the ETF to provide 'clean' service water for operational and maintenance functions, e.g., for boiler water and for backwashing the filters. This recycling keeps the quantity of fresh water used to a minimum.

4.2.4 Secondary Treatment Train

The secondary treatment system typically receives and processes the 39 following by-products generated from the primary treatment train: concentrate 40 from the first RO stage, filter backwash, regeneration waste from the ion 41 exchange system, and spillage or overflow received into the process sumps. 42 Depending on the operating configuration, however, some aqueous waste could be 43 44 processed in the secondary treatment train before the primary treatment train 45 (refer to Figures 4-4 and 4-5 for example operating configurations).

The secondary treatment train provides the following processes:

- Secondary waste receiving tank receiving
- Evaporation concentrates secondary waste streams

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- Concentrate staging concentrate receipt and pH adjustment in concentrate tanks
- Thin film drying dewatering of secondary waste streams
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• Container handling - packaging of dewatered secondary waste.

Secondary Waste Receiving. Waste to be processed in the secondary
 treatment train is received into two secondary waste receiving tanks, where
 the pH can be adjusted with sulfuric acid or sodium hydroxide for optimum
 evaporator performance.

Evaporation. The ETF evaporator is fed alternately by the two secondary waste receiving tanks. One tank serves as a waste receiver while the other tank is operated as the feed tank. The ETF evaporator vessel (also referred to as the vapor body) is the principal component of the evaporation process (Figure 4-11).

19 Feed from the secondary waste receiving tanks is pumped through a heater 20 to the recirculation loop of the ETF evaporator. In this loop, concentrated 21 waste is recirculated from the ETF evaporator, to a heater, and back into the 22 evaporator where vaporization occurs. As water leaves the evaporator system 23 in the vapor phase, the concentration of the waste in the evaporator 24 increases. When the concentration of the waste reaches the appropriate 25 density, a portion of the concentrate is pumped to one of the concentrate 26 tanks. 27

28 The vapor that is released from the ETF evaporator is routed to the 29 entrainment separator, where water droplets and/or particulates are separated from the vapor. The 'cleaned' vapor is routed to the vapor compressor and 30 31 heater. The steam from the vapor compressor/heater is used to heat the recirculating concentrate in the ETF evaporator. From the vapor compressor/heater, the steam is condensed and fed to the distillate flash 32 33 34 tank, where the saturated condensate received from the heater drops to 35 atmospheric pressure and cools to the normal boiling point through partial 36 flashing (rapid vaporization caused by a pressure reduction). The resulting distillate is routed to the surge tank. Noncondensible vapors, such as air. 37 38 are exhausted by a vacuum blower to the vessel offgas system. 39

40 **Concentrate Staging.** The concentrate tanks make up the head end of the 41 thin film drying process. From the ETF evaporator, concentrate is pumped into 42 two concentrate tanks and pH adjusted. The concentrate tanks function 43 alternately between concentrate receiver and feed tank for the thin film 44 dryer. 45

46 Thin Film Drying. From the concentrate tanks, feed is pumped through a 47 preheater to the thin film dryer (Figure 4-12) that is heated by steam. As 48 the concentrated waste flows down the length of the dryer, the waste is dried. 49 The dried film, or powder, is scraped off the dryer cylinder by blades 50 attached to a rotating shaft. The powder is funnelled through a cone-shaped 51 powder hopper at the bottom of the dryer and into the Container Handling 52 System. Overhead vapor released by the drying of the concentrate is condensed in the distillate condenser. Excess heat is removed from the distillate by a water-cooled heat exchanger. Part of the distillate is circulated back to the condenser spray nozzles. The remaining distillate is pumped to the surge tank. Any noncondensible vapors and particulates from the spray condenser are exhausted to the vessel offgas system.

Container Handling. Before an empty container is moved into the Container Handling System (Figure 4-13), the lids are loosely placed on the containers and the container is placed on a conveyor. After the lid is removed, the containers are moved into the container filling area after passing through an air lock. The empty container is located under the thin film dryer, and raised into position. The container is sealed to the thin film dryer and a rotary valve begins the transfer of powder to the empty container. Air displaced from the container is vented to the entrainment separator attached to the ETF evaporator that exhausts to the vessel offgas system.

The container is filled to a predetermined level, recapped, and moved along the conveyor to the smear station airlock. At the smear station airlock, the container is moved onto the conveyor by remote control. The airlock is opened and the smear sample (surface wipe) is taken and the radionuclide contamination level counted. A 'C' ring is installed to secure the container lid. If the container has contaminated material on the outside, the container is moved to the washdown station and washed. The container wash water drains to sump tank 1. The washed container is air-dried and retested. Filled containers that pass the smear test are labeled, placed on pallets, and moved by forklift to the filled container storage area. Section 4.3 provides a more detailed discussion of container handling.

4.2.5 Other Effluent Treatment Facility Systems

The ETF is provided with support systems that facilitate treatment in the primary and secondary treatment trains and that provide for worker safety and environmental protection. An overview of the following systems is provided:

- Monitor and control system
- Vessel offgas system
- Sump collection system
- Chemical reagent feed system
- Utilities.

44 4.2.5.1 Monitor and Control System. The operation of the ETF is monitored
45 and controlled by a centralized computer system (i.e., monitor and control
46 system or MCS). The MCS continuously monitors data from various field
47 indicators, such as pH, flow, tank level, temperature, pressure, conductivity,
48 alarm status, and valve switch positions. Data gathered by the MCS enable
49 operations and engineering personnel to document and adjust the operation of
50 the ETF.

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4.2.5.2 Vessel Offgas System. Ventilation for various tanks and vessels is provided through the vessel offgas system. The system includes a moisture separator, duct heater, pre-filter, high-efficiency particulate air filters, carbon adsorber, exhaust fans, and ductwork. Gasses ventilated from the tanks and vessels enter the exhaust system through the connected ductwork. The vessel offgas system draws vapors and gasses off the following tanks and treatment systems:

Surge tank

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- ETF evaporator
- pH adjustment tank
- Concentrate tanks
- Degasification system
- First and second RO stages
- Dry powder hopper
- Effluent pH adjustment tank
- Drum capping station
- Secondary waste receiving tanks
- Resin dewatering system
- Distillate condenser (off the thin film dryer)
- Sump tanks 1 and 2.

23 The vessel offgas system maintains a negative pressure with respect to 24 the atmosphere, which produces a slight vacuum within tanks, vessels, and 25 ancillary equipment for the containment of gas vapor. This system also 26 provides for the collection, monitoring, and treatment of confined airborne 27 in-vessel contaminants to preclude over-pressurization. The high-efficiency 28 particulate air filters remove particulates and condensate from the air stream before these are discharged to the radiologically controlled heating, 29 30 ventilation, and air conditioning system. 31

32 4.2.5.3 Sump Collection System. Sump tanks 1 and 2 compose the sump 33 collection system that provides containment of waste streams and liquid 34 overflow associated with the ETF processes. The process area floor is sloped 35 to two separate trenches that each drain to a sump tank located under the floor of the ETF. One trench runs the length of the primary treatment train 36 37 and drains to sump tank 2 located underneath the verification tank pump floor. 38 The second trench collects spillage primarily from the secondary treatment 39 train and flows to sump tank 1 located near the ETF evaporator. Sump tanks 1 40 and 2 are located below floor level (Figure 4-14). An eductor in these tanks 41 prevents sludge from accumulating. 42

4.2.5.4 Chemical Injection Feed System. At several points within the primary
and secondary treatment trains, sulfuric acid and sodium hydroxide (or dilute
solutions of these reagents) are metered into specific process units to adjust
the pH. For example, a dilute solution of 4 percent sulfuric acid and 4
percent sodium hydroxide could be added to the secondary waste receiving tanks
to optimize the evaporation process.

50 4.2.5.5 Verification Tank Recycle System. To reduce the amount of water 51 added to the process, verification tank water (i.e., verified effluent) is recycled throughout the ETF process. The following tanks and ancillary equipment use verification tank water:

- 4% H₂SO₂ solution tank and ancillary equipment
- 4% NaOH solution tank and ancillary equipment
- Clean-in-place tank and ancillary equipment
- ETF evaporator boiler and ancillary equipment
- Thin film dryer boiler and ancillary equipment.

4.2.5.6 Utilities. The ETF maintains the following utility supply systems required for the operation of the ETF:

- Cooling water system removes heat from process water via heat exchangers and a cooling tower
- Compressed air system provides air to process equipment and instrumentation
- Seal water system provides cool, clean, pressurized water to process equipment for pump seal cooling and pump seal lubrication, and provides protection against failure and fluid leakage
- Demineralized water system removes solids from raw water system to produce high-quality, low ion-content, water for steam boilers, and for the hydrogen peroxide feed system.
- Heating, ventilation, and air conditioning system provides continuous heating, cooling, and air humidity control throughout the ETF.

The following utilities support ETF activities:

- Electrical power
- Sanitary water
- Communication systems
- Raw water.

39 4.3 CONTAINERS [D-1]

40 41 This section provides specific information on container storage 42 operations at the ETF, including descriptions of containers, labeling, and 43 secondary containment structures.

A list of dangerous and/or mixed waste stored in containers at the ETF is presented in Chapter 1.0. The types of dangerous and/or mixed waste managed in the container storage areas of the ETF may include the following secondary waste generated by the ETF processes:

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Dry powder waste generated from the treatment process

Miscellaneous waste generated by operations and maintenance activities.

6 The secondary treatment train processes the waste by-products from the 7 primary treatment train, which are concentrated and dried into a powder. 8 Containers are filled with dry powder waste from the thin film dryer via a 9 remotely controlled system. Miscellaneous waste generated from maintenance 10 and operations activities also are stored at the ETF. The waste could include process waste, such as used filter elements; spent RO membranes; damaged 11 12 equipment: and decontamination and maintenance waste, such as contaminated 13 rags, gloves, and other personal protective equipment. Liquids generally are 14 packaged with absorbents at a 2 to 1 ratio. 15

16 Several container collection areas could be located within the ETF process and container handling areas. These collection areas are used only to 17 18 accumulate waste in containers. Once a container is filled, the container is 19 transferred either to the container storage area (Figure 4-3) or to another 20 TSD unit. The container storage area, a 22.9 x 8.5-meter room, is located 21 adjacent to the ETF process area. The containers within the container storage 22 area are clearly labelled, and access to these containers is limited by 23 barriers and by administrative controls. The ETF floor provides secondary 24 containment, and the ETF roof and walls protects all containers from exposure 25 to the elements. 26

28 4.3.1 Description of Containers [D-1a]

30 The containers used to collect and store dry powder waste are 208-liter 31 steel containers. Most of the maintenance and operation waste is stored in 32 208-liter steel containers; however, in a few cases, the size of the container could vary to accommodate the size of a particular waste. For example, some 33 process waste, such as spent filters, might not fit into a 208-liter 34 35 container. In the case of spent resin from the IX columns, the resin is dewatered and could be packaged in a special disposal container. In these few 36 37 cases, specially sized containers could be required. In all cases, however, 38 only approved container are used and are compatible with the associated waste. 39

40 Current operating practices indicate the use of new 208-liter containers 41 that either have a polyethylene liner or a protective coating. Any reused or 42 reconditioned container is inspected for container integrity before use. 43 Overpack containers are available for use with damaged containers. Overpack 44 containers typically are unlined steel or polyethylene. Per Chapter 1.0, a 45 maximum of 147,630 liters of dangerous and/or mixed waste could be stored in 46 containers in the ETF.

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49 4.3.2 Container Management Practices [D-1b]

51 Before use, each container is checked for signs of damage such as dents, 52 distortion, corrosion, or scratched coating. For dry powder loading, empty

containers on pallets are raised by a forklift and manually placed on the 2 conveyor that transports the containers to the automatic filling station in the container handling room (Figure 4-13). The container lids are removed and 3 replaced automatically during the filling sequence. After filling, containers 4 5 exit the container handling room via the filled drum conveyor. Locking rings 6 are installed, the container label is affixed, and the container is moved by 7 dolly or forklift to the container storage area. 8

Containers used for maintenance and operations secondary waste are 10 labeled before being placed in the container storage area or in a collection 11 area. Lids are secured on these containers when not being filled. When the containers in a collection area are full, the containers are transferred by 13 dolly or forklift to the container storage area or to an appropriate TSD unit.

15 The filled containers in the container storage area are inventoried. 16 checked for proper labeling, and placed on pallets. Each pallet is moved by 17 forklifts. Within a container storage area, palletized containers are stacked 18 no more then three pallets high and in rows no more than two containers wide. 19 Rows are separated by unobstructed aisles with a minimum of 76-centimeter 20 aisle space. 21

4.3.3 Container Labeling [D-1c]

25 . Labels are affixed on containers used to store dry powder when the containers leave the container handling room. Labels are affixed on maintenance and operations waste containers before being placed in a container storage area. Every container is labeled with the date that the container was filled. Appropriate major risk labels, such as "corrosive", "toxic" or "F-listed", also are added. Each container also has a label with an identification number for tracking purposes.

4.3.4 Containment Requirements for Storing Containers [D-1d]

36 Secondary containment is provided in the container storage area and the collection areas, though the containers are not anticipated to contain 37 38 appreciable liquids. The secondary containment provided for tank systems also serves the container storage area and the collection areas. This section 39 describes the design and operation of the secondary containment structure for 40 41 the container storage area and collection areas. Detailed drawings of the ETF 42 secondary containment systems are presented in Appendix 4B. 43

44 4.3.4.1 Secondary Containment System Design [D-1d(1)(a)]. For the container storage area and the collection areas within the ETF, secondary containment is 45 provided by the reinforced concrete floor and a 15.2-centimeter rise (berm) 46 along the walls of the container storage areas of the ETF. The engineering 47 48 assessment required for tanks (Mausshardt 1995) also describes the design and 49 construction of the secondary containment provided for the ETF container storage areas. All systems were designed to national codes and standards 50 (e.g., American Society for Testing Materials, American Concrete Institute 51 52 standards).

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The floor in composed of cast-in-place and pre-formed concrete slabs and 1. has a minimum thickness of 15.2 centimeters. All slab joints and floor and 2 3 wall joints have waterstops installed at the mid-depth of the slab. In 4 addition, filler was applied to each joint. The floor and berms are coated with a chemically resistant, high-solids epoxy coating system consisting of 5 6 primer, filler, and top coating. This coating material is compatible with the waste stored in containers and is an integral part of the secondary • 7 8 containment system for containers. 9

The floor is sloped to drain any solution in the container storage area to floor drains along the west wall. Each floor drain consists of a grating over an 20.3-centimeter drain port connected to a 4-inch stainless steel transfer pipe. The pipe passes under this wall and connects to a trench running along the east wall of the adjacent process area. This trench drains solution to sump tank 1.

17 The container storage area is separated from the process area by a common 18 wall and a door for access to the two areas (Figure 4-2). These two areas 19 also share a common floor and trenches that, with the 15.2-centimeter rise of 20 the containing walls, form the secondary containment system for the process 21 area and the container storage area. 22

23 4.3.4.1.1 Structural Integrity of Base [D-1d(1)(b)]. Engineering calculations were performed showing the floor of the container storage area is 24 capable of supporting the weight of containers. These calculations were 25 26 reviewed and certified by a professional engineer (Mausshardt 1995). The 27 concrete was inspected for damage during construction. Cracks were identified and repaired to the satisfaction of the professional engineer. Documentation 28 29 of these certifications is included in the engineering assessment (Mausshardt 1995) and a copy of the certification is provided in Appendix 4C. 30 31

4.3.4.1.2 Containment System Capacity [D-ld(1)(c)]. The container storage area is primarily used to store dry powder and maintenance and operation waste. Where appropriate, absorbents are added to fix any trace liquids present. Large volumes of liquid are not stored in the container storage area. The maximum volume of waste that can be stored in containers in the container storage area is 147,630 liters.

Both the process area and the container storage area are considered in 39 the containment system capacity. The volume available for secondary 40 41 containment in the process area is approximately 68,000 liters, as discussed in the engineering assessment (Mausshardt 1995). Using the dimensions of the 42 container storage area (22.9 by 8.5 by 0.15 meters), and assuming that 43 50 percent of the floor area is occupied by containers, the volume of the 44 container storage area is 14,900 liters. The combined volume of both the 45 container storage and process areas available for secondary containment, 46 47 therefore, is 82,900 liters. This volume is greater than 10 percent of the 48 maximum total volume of containers allowed for storage in the ETF, as discussed previously. 49

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4.3.4.1.3 Control of Run-on [D-1d(1)(d)]. The container storage area and collection areas are located within the ETF, which serves to prevent run-on of precipitation.

4.3.4.2 Removal of Liquids from Containment Systems [D-1d(2)]. The container storage area is equipped with drains that route solution to a trench in the process area which drains to sump tank 1. The sump tanks are equipped with alarms that notify operating personnel that a leak is occurring. The sump tanks also are equipped with pumps to transfer waste to the surge tank or the secondary treatment train.

12 4.3.4.3 Prevention of Ignitible, Reactive, and Incompatible Wastes in 13 **Containers** [D-1f]. Individual waste types, i.e., ignitable, corrosive, and 14 reactive, are stored in separate containers. A waste that could be 15 incompatible with other wastes is separated and protected from the incompatible waste. For example, acidic and caustic wastes are stored in separate containers. Free liquids are absorbed in containers that hold 16 17 incompatible waste at a 2 to 1 ratio. Additionally, ETF-specific packaging 18 19 requirements for these types of waste provide extra containment with each individual container. For example, each item of acidic waste is individually 20 21 bagged and sealed within a lined container. 22

4.4 TANK SYSTEMS [D-2]

This section provides specific information on tank systems, including a discussion on the types of waste to be managed in the tanks, tanks design information, integrity assessments, and additional information on the ETF tanks that treat and store dangerous and/or mixed waste. Detailed drawings of the ETF tank systems are provided in Appendix 4B.

The relative locations of the tanks in the ETF are presented in Figure 4-3. The major process units and tanks include:

- Load-In Station
- UV/0X
- R0
- IX/Polishers
- Verification tanks
- ETF evaporator
- Thin film dryer.
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4.4.1 Design Requirements [D-2a(1)]

The following sections provide an overview of the design specifications for the tanks within the ETF. A separate discussion on the design of the process units also is provided. In accordance with the new tank system requirements of WAC 173-303-640(3), the following tank components and specifications were assessed: 51

- Dimensions, capacities, wall thicknesses, and pipe connections
- Materials of construction and linings and compatibility of materials with the waste being processed
- Materials of construction of foundations and structural supports
- Review of design codes and standards used in construction
- Review of structural design calculations, including seismic design basis

• Waste characteristics and the affects of waste on corrosion.

This assessment was documented in the Final RCRA Information Needs Report (Mausshardt 1995), the engineering assessment performed for the ETF tank systems by an independent professional engineer. A similar assessment of design requirements was performed for the load-in tanks and is documented in 200 Area Effluent BAT/AKART Implementation, ETF Truck Load-In Facility, Project W-291H Integrity Assessment Report (KEH 1994).

The specifications for the preparation, design, and construction of the tanks systems at the ETF are documented in the Design Construction Specification, Project C-018H, 242-A Evaporator/PUREX Plant Process Condensate Treatment Facility (WHC 1992a). The preparation, design, and construction of the load-in tanks are provided in the construction specifications in Project W-291, 200 Area Effluent BAT/AKART Implementation ETF Truck Load-in Facility (KEH 1994).

30 Most of the tanks in the ETF are constructed of stainless steel. According to the design of the ETF, it was determined that stainless steel 31 32 would provide adequate corrosion protection for these tanks. Exceptions 33 include the verification tanks, which are constructed of carbon steel with an epoxy coating. The ETF evaporator/vapor body (and the internal surfaces of 34 35 the thin film dryer) are constructed of a corrosion resistent alloy, known as alloy 625, to address the specific corrosion concerns in the secondary 36 treatment train. Finally, the hydrogen peroxide decomposer vessels are 37 38 constructed of carbon steel and coated with a vinyl ester lining. 39

The shell thicknesses of the tanks identified in this table represent a nominal thickness of a new tank when placed into operation. The tank capacities identified in this table represent the maximum operating volumes. For certain tanks (as indicated in the table), the maximum operating volume is also the nominal (routine) operating capacity. Nominal tank volumes represent the volume betwen the low-level and high-level shutoffs in a tank unit.

47 Dangerous and/or mixed waste that can be treated or stored in the ETF 48 tanks is presented in Chapter 1.0. Aqueous waste, in addition to process 49 condensate, that is treated and stored at the LERF and ETF includes, but is 50 not limited to, the following: contaminated groundwater from pump-and-treat 51 remediation activities such as groundwater from the 200-UP-1 Operable Unit; 52 water from deactivation activities such as water from the spent fuel storage

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basins at deactivated reactors (e.g., N Reactor); laboratory aqueous waste from unused samples and sample analyses; and leachate from landfills, such as the Environmental Restoration Disposal Facility.

Before accepting a new aqueous waste stream at the LERF or ETF, an evaluation of the waste characteristics is performed to determine the treatability of the aqueous waste, including the potential to corrode the ETF tanks. This acceptance evaluation is discussed in the waste analysis plan (Appendix 3A). If the evaluation indicates a new aqueous waste stream would significantly increase corrosion rates, processing actions are initiated to reduce corrosion. These actions might include blending the aqueous waste with other aqueous waste or adjusting the pH of the aqueous waste to reduce corrosion.

4.4.1.1 Codes and Standards for Tank System Construction. Specific standards for the manufacture of tanks and process systems installed in the ETF are briefly discussed in the following sections. In addition to these codes and industrial standards, a seismic analysis for each tank and process system is required [WAC 173-303-806(4)(a)(xi)]. The seismic analysis is performed in accordance with UCRL-15910 Design and Evaluation Guidelines for Department of Energy Facilities Subjected to Natural Phenomena Hazards, Section 4 (UCRL 1987). The results of the seismic analyses are summarized in the engineering assessment of the ETF tank systems (Mausshardt 1995).

Storage and Treatment Tanks. The following tanks that store and/or treat aqueous waste at the ETF are maintained at or near atmospheric pressure.

<u>Tank name</u>	Tank number
Surge tank	2025E-60A-TK-1
pH adjustment tank	2025E-60C-TK-1
Effluent pH adjustment tank	2025E-60C-TK-2
First RO feed tank	2025E-60F-TK-1
Second RO feed tank	2025E-60F-TK-2
Verification tanks (three)	2025E-60H-TK-1A/1B/1
Secondary waste receiving tanks (two)	2025E-60I-TK-1A/1B
Concentrate tanks (two)	2025E-60J-TK-1A/1B
Sump tanks (two)	2025E-20B-TK-1/2
Distillate flash tank	2025E-60I-TK-2

The relative location of these tanks is presented in Figure 4-2. The codes and standards applicable to the design, construction, and testing of the above tanks and ancillary piping systems are as follows:

ASME - B31.3Chemical Plant and Petroleum Refinery Piping
(ASME 1990)ASME Sect. VIII,
Division IPressure Vessels (ASME 1992a)AWS - D1.1Structural Welding Code - Steel (AWS 1992)ANSI - B16.5Pipe Flanges and Flanged Fittings (ANSI 1992)ASME Sect. IX
API 620Welding and Brazing Qualifications (ASME 1992b)Pressure Storage Tanks (API 1990)

AWWA - D100 AWWA - D103 AWWA - D120

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Welded Steel Tanks for Water Storage (AWWA 1989) Factory-Coated Bolted Steel Tanks for Water Storage (AWWA 1987) Thermosetting Fiberglass-Reinforced Plastic Tanks (AWWA 1984).

7 The application of these standards to the construction of ETF tanks and 8 independent verification of completed systems ensured that the tank and tank 9 supports had sufficient structural strength and that seams and connections 10 were adequate to ensure tank integrity. In addition, each tank met strict quality assurance requirements. Each tank constructed offsite was tested for 11 12 integrity and leak tightness before shipment to the Hanford Facility. 13 Following installation, the systems were inspected for damage to ensure 14 against leakage and to verify proper operation. If a tank was damaged during 15 shipment or installation, leak tightness testing was repeated onsite.

4.4.1.2 Design Information for Tanks Located Outside of Effluent Treatment
 Facility. The load-in tanks, surge tank, and verification tanks are located
 outside the ETF. These tanks are located within concrete structures that
 provide secondary containment.

Load-In Tanks and Ancillary Equipment. The load-in tanks are constructed of stainless steel, are heated, and have a nominal capacity of 37,900 liters. Ancillary equipment includes transfer pumps, a double-encased, fiberglass transfer pipeline, level instruments for tanker trucks, and leak detection equipment. From the Load-In Station, aqueous waste can be routed to the surge tank or to the LERF through a double-encased line. The load-in tanks, sump, pumps, and truck pad are all provided with secondary containment.

Surge Tank and Ancillary Equipment. The surge tank is constructed of stainless steel and has a nominal capacity of 379,000 liters. Ancillary equipment to the surge tank includes two underground double-encased (i.e., pipe-within-a-pipe) transfer lines connecting to LERF and three pumps for transferring aqueous waste to the primary treatment train. The surge tank is located at the south end of the ETF. The surge tank is insulated and the contents heated to prevent freezing. Eductors in the tank provide mixing.

Verification Tanks and Ancillary Equipment. The verification tanks are 38 located north of the ETF. The verification tanks have a nominal capacity of 39 40 2,540,000 liters each. For support, the tanks have a center post with a webbing of beams that extend from the center post to the sides of the tank. 41 The roof is constructed of epoxy covered carbon steel that is attached to the 42 43 cross beams of the webbing. The tank floor also is constructed of epoxy 44 covered carbon steel and is sloped. Eductors are installed in each tank to 45 provide mixing. 46

47 Ancillary equipment includes a return pump that provides circulation of 48 treated effluent through the eductors. The return pump also recycles effluent 49 back to the ETF for retreatment and can provide service water for ETF 50 functions. Two transfer pumps are used to discharge treated effluent to SALDS 51 or back to the LERF.

4.4.1.3 Design Information for Tanks Located Inside the Effluent Treatment Facility Building. Most of the ETF tanks and ancillary equipment that store or treat dangerous and/or mixed waste are located within the ETF. The structure serves as secondary containment for the tank systems.

pH Adjustment Tank and Ancillary Equipment. The pH adjustment tank has a nominal capacity of 9,800 liters. Ancillary equipment for this tank includes overflow lines to a sump tank and pumps to transfer waste to other units in the main treatment train.

Effluent pH Adjustment Tank and Ancillary Equipment. The effluent pH adjustment tank has a nominal capacity of 9,500 liters. Ancillary equipment includes overflow lines to a sump tank and pumps to transfer waste to the verification tanks.

First and Second Reverse Osmosis Feed Tanks and Ancillary Equipment. The first RO feed tank is a vertical, stainless steel tank with a round bottom and has a nominal capacity of 11,400 liters. Conversely, the second RO feed tank is a rectangular vessel with the bottom of the tank sloping sharply to a single outlet in the bottom center. The second RO feed tank has a nominal capacity of 7,600 liters. Each RO tank has a pump to transfer waste to the RO arrays. Overflow lines are routed to a sump tank.

Secondary Waste Receiving Tanks and Ancillary Equipment. Two 57,000-liter secondary waste receiving tanks collect waste from the units in the main treatment train, such as reject solution (retentate) from the RO units and regeneration solution from the IX columns. These are vertical, cylindrical tanks with a semi-elliptical bottom and a flat top. Ancillary equipment includes overflow lines to a sump tank and pumps to transfer aqueous waste to the ETF evaporator.

32 Effluent Treatment Facility Evaporator and Ancillary Equipment. The ETF 33 evaporator, the principal component of the evaporation process, is a 34 cylindrical pressure vessel with a conical bottom. Aqueous waste is fed into 35 the lower portion of the vessel. The top of the vessel is domed and the vapor 36 outlet is configured to prevent carryover of liquid during the foaming or 37 bumping (violent boiling) at the liquid surface. The ETF evaporator has a 38 capacity of approximately 21,000 liters.

The ETF evaporator includes the following ancillary equipment:

- Preheater
- Recirculation pump
- Waste heater with steam level control tank
- Concentrate transfer pump
- Entrainment separator
- Vapor compressor with silencers
- Silencer drain pump.

Distillate Flash Tank and Ancillary Equipment. The distillate flash tank is a horizontal tank that has an nominal operating capacity of 570 liters.

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Ancillary equipment includes a pump to transfer the distillate to the surge
 tank for reprocessing.

4 **Concentrate Tanks and Ancillary Equipment.** Each of the two concentrate 5 tanks has an approximate capacity of 18,900 liters. Ancillary equipment 6 includes overflow lines to a sump tank and pumps for recirculation and 7 transfer.

Sump Tanks. Sump tanks 1 and 2 are located below floor level. Both sump tanks are double-walled, rectangular tanks, placed inside concrete vaults. Both tanks have a working volume of 3,000 liters each. The sump tanks are located in pits belowgrade to allow gravity drain of solutions to the tanks. Each sump tank has two vertical pumps for transfer of waste to the secondary waste receiving tanks or to the surge tank for reprocessing.

16 4.4.1.4 Design Information for Effluent Treatment Facility Process Units. As 17 with the ETF tanks, process units that treat and/or store dangerous and/or mixed waste are maintained at or near atmospheric pressure. These units were 18 constructed to meet a series of design standards, as discussed in the 19 following sections. Table 4-2 presents the materials of construction and the 20 21 ancillary equipment associated with these process units. All piping systems are designed to withstand the effects of internal pressure, weight, thermal 22 23 expansion and contraction, and any pulsating flow. The design and integrity 24 of these units are presented in the engineering assessment (Mausshardt 1995). 25

Filters. The fine and rough filter vessels (including the auxiliary filters) are designed to comply with the ASME Section VIII, Division I, Pressure Vessels (ASME 1992a). The application of these standards to the construction of the ETF filter system and independent inspection ensure that the filter and filter supports have sufficient structural strength and that the seams and connections are adequate to ensure the integrity of the filter vessels.

34 Ultraviolet Oxidation System. The UV/OX reaction chamber is designed to 35 comply with manufacturers standards. 36

37 Degasification System. The codes and standards applicable to the design, 38 fabrication, and testing of the degasification column are identified as 39 follows: 40

ASME Section VIII, Division I, Pressure Vessels (ASME 1992a) ASME - B31.3, Chemical Plant and Petroleum Refinery Piping (ASME 1990) AWS - D1.1, Structural Welding Code - Steel (AWS 1992) ANSI - B16.5, Pipe Flanges and Flanged Fittings (ANSI 1992).

Reverse Osmosis System. The pressure vessels in the RO unit are designed
 to comply with ASME Section VIII, Division I, Pressure Vessels (ASME 1992a),
 and applicable codes and standards.

50 Ion Exchange (Polishers). The IX columns are designed in accordance with 51 ASME Section VIII, Division I, Pressure Vessels (ASME 1992a), and applicable 52 codes and standards. Polisher piping is fabricated of type 304 stainless

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steel or polyvinyl chloride (PVC) and meets the requirements of ASME B31.3, Chemical Plant and Petroleum Refinery Piping (ASME 1990).

Effluent Treatment Facility Evaporator. The ETF evaporator is designed to meet the requirements of ASME Section VIII, Division I, Pressure Vessels (ASME 1992a), and applicable codes and standards. The ETF evaporator piping meets the requirements of ASME B31.3, Chemical Plant and Petroleum Refinery Piping (ASME 1990).

Thin Film Dryer System. The thin film dryer is designed to meet the requirements of ASME Section VIII, Division I, Pressure Vessels (ASME 1992a), and applicable codes and standards. The piping meets the requirements of ASME - B31.3, Chemical Plant and Petroleum Refinery Piping (ASME 1990).

4.4.2 Integrity Assessments [D-2a(2)]

The integrity assessment for ETF (Mausshardt 1995) attests to the adequacy of design and integrity of the tanks and ancillary equipment to ensure that the tanks and ancillary equipment will not collapse, rupture, or fail over the intended life considering intended uses. For the load-in tanks, a similar integrity assessment was performed (KEH 1995). Specifically, the assessment documents the following considerations:

- Adequacy of the standards used during design and construction of the facility
- Characteristics of the solution in each tank
- Adequacy of the materials of construction to provide corrosion protection from the solution in each tank
- Results of the leak tests and visual inspections.

The results of these assessments demonstrate that tanks and ancillary equipment have sufficient structural integrity and are acceptable for storing and treating dangerous and/or mixed waste. The assessments also state that the tanks and building were designed and constructed to withstand a designbasis earthquake. These tank assessments were certified by independent, qualified registered professional engineers.

42 The scope of the ETF tank integrity assessment was based on characterization data from process condensate. To assess the effect that 43 44 other aqueous waste might have on the integrity of the ETF tanks, the 45 chemistry of an aqueous waste will be evaluated for its potential to corrode a tank (e.g., chloride concentrations will be evaluated). The tank integrity 46 47 assessment for the load-in tanks was based on characterization data from 48 several aqueous waste streams. The chemistry of an aqueous waste stream not considered in the load-in tank integrity assessment also will be evaluated for 49 the potential to corrode a load-in tank. 50 51

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1 Consistent with the recommendations of the integrity assessment, a 2 corrosion inspection program was developed. Periodic integrity assessments are scheduled for those tanks that are predicted to have the highest potential 3 for corrosion. These inspections are scheduled annually or longer to follow 4 5 the end of a treatment campaign. These 'indicator tanks' include the concentrate tanks, secondary waste receiving tanks, and verification tanks. 6 One of each of these tanks will be inspected yearly to determine if corrosion 7 or coating failure has occurred. Should significant corrosion or coating 8 9 failure be found, an additional tank of the same type will be inspected during 10 the same year. In the case of the verification tanks, if corrosion or coating 11 failure is found in the second tank, the third tank also will be inspected. If significant corrosion is observed in all three sets of indicator tanks, the 12 balance of the ETF tanks would be considered for inspection. For tanks 13 predicted to have lower potential for corrosion, inspections also are 14 15 performed nonroutinely as part of the corrective maintenance program. 16

18 4.4.3 Additional Requirements for New Tanks [D-2a(4)] 19

20 Procedures for proper installation of tanks, tank supports, piping, 21 concrete, etc., are included in Construction Specification, Project C-018H, 22 242-A Evaporator/PUREX Plant Process Condensate Treatment Facility 23 (WHC 1992a). For the load-in tanks, procedures are included in the 24 construction specifications in Project W-291, 200 Area Effluent BAT/AKART 25 Implementation ETF Truck Load-in Facility (KEH 1994). Following installation, the tanks and secondary containment were inspected by an independent, 26 27 aualified, registered professional engineer. Deficiencies identified included damage to the surge tank, damage to the verification tank liners, and ETF 28 29 secondary containment concrete surface cracking. All deficiencies were 30 repaired to the satisfaction of the engineer. The tanks and ancillary 31 equipment were leak tested as part of acceptance of the system from the construction contractor. Information on the inspections and leak tests are 32 33 included in the engineering assessment (Mausshardt 1995). No deficiencies were identified during installation of the load-in tanks and ancillary 34 35 equipment. 36

37 38 4.4.4 Secondary Containment and Release Detection for Tank Systems [D-2b] 39

40 This section describes the design and operation of secondary containment 41 and leak detection systems at the ETF.

4.4.4.1 Secondary Containment Requirements for All Tank Systems [D-2b(1)]. 43 The specifications for the preparation, design, and construction of the 44 45 secondary containment systems at the ETF are documented (WHC 1992a). The preparation, design, and construction of the secondary containment for the 46 load-in tanks are provided in the construction specifications (KEH 1994). All 47 systems were designed to national codes and standards. Constructing the ETF 48 per these specifications ensured that foundations are capable of supporting 49 tank and secondary containment systems and that uneven settling and failures 50 from pressure gradients should not occur. 51 52

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4.4.4.1.1 Common Elements. The following text describes elements of secondary containment that are common to all ETF tank systems. Details on the secondary containment for specific tanks, including leak detection systems and liquids removal, are provided in Section 4.4.5.1.

Foundation and Construction. For the tanks within the ETF, except for the sump tanks, secondary containment is provided by a coated concrete floor and a 15.2-centimeter rise (berm) along the containing walls. The double-wall construction of the sump tanks provides secondary containment. Additionally, trenches are provided in the floor that also provide containment and drainage of any liquid to a sump pit. For tanks outside the ETF, secondary containment also is provided with coated concrete floors in a containment pit (load-in tanks) or surrounded by concrete dikes (the surge and verification tanks).

The transfer piping that carries aqueous waste into the ETF is pipe-within-a-pipe construction, and is buried approximately 1.2 meters below ground surface. The pipes between the verification tanks and the verification tank pumps within the ETF are located in a concrete pipe trench.

For the purpose of this discussion, there are five discrete secondary containment systems associated with the following tanks and ancillary equipment that treat or store dangerous and/or waste:

- Load-in tanks
- Surge tank
- Process area (including sump tanks)
- Verification tanks
- Transfer piping and pipe trenches.

30 All of the secondary containment systems are designed with reinforcing 31 steel and base and berm thickness to minimize failure caused by pressure 32 gradients, physical contact with the waste, and climatic conditions. 33 Classical theories of structural analysis, soil mechanics, and concrete and structural steel design were used in the design calculations for the 34 foundations and structures. These calculations are maintained at the ETF. In 35 each of the analyses, the major design criteria from the following documents 36 37 were included:

- V-C018HC1-001 Design Construction Specification, Project C-018H, 242A Evaporator/PUREX Plant Process Condensate Treatment Facility (WHC 1992a)
 - DOE Order 6430.1A General Design Criteria
 - SDC-4.1 Standard Architectural-Civil Design Criteria, Design Loads for Facilities (DOE-RL 1988)
- UCRL-15910 Design and Evaluation Guidelines for Department of Energy Facilities Subjected to Natural Phenomena Hazards (UCRL 1987)

Uniform Building Code, 1991 Edition (ICBO 1991).

UBC-91

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1 The design and structural analysis calculations substantiate the 2 structural designs in the referenced drawings. The conclusions drawn from 3 these calculations indicate that the designs are sound and that the specified 4 structural design criteria were met. This conclusion is verified in the 5 independent design review that was part of the engineering assessment 6 (Mausshardt 1995).

8 **Containment Materials.** The concrete floor consists of cast-in-place and 9 preformed concrete slabs. All slab joints and floor and wall joints have 10 waterstops installed at the mid-depth of the slab. In addition, filler was 11 applied to each joint. 12

13 Except for the sump tank vaults, all of the concrete surfaces in the 14 secondary containment system, including berms, trenches, and pits, are coated 15 with a chemical-resistant, high-solids, epoxy coating that consists of a 16 primer, filler, and a top coating. This coating material is compatible with 17 the waste being treated, and with the sulfuric acid, sodium hydroxide, and hydrogen peroxide additives to the process. The coating protects the concrete 18 19 from contact with any chemical materials that might be harmful to concrete and 20 prevents the concrete from being in contact with waste material. Table 4-3 21 summarizes the specific types of filler, primer, second, and finish coats 22 specified for the concrete and masonry surfaces in the ETF. The epoxy coating 23 is considered integral to the secondary containment system for the tanks and 24 ancillary equipment. 25

The concrete containment systems are maintained such that any cracks, gaps, holes, and other imperfections are repaired in a timely manner. Thus, the concrete containment systems do not allow spilled liquid to reach soil or groundwater. There are a number of personnel doorways and vehicle access points into the ETF process area. Releases of any spilled or leaked material to the environment from these access points are prevented by a 15.2-centimeter concrete curbs, sloped areas of the floor (e.g., truck ramp), or trenches.

Containment Capacity and Maintenance. Each of these containment areas is designed to contain more than 100 percent of the volume of the largest tank in each respective system. Secondary containment systems for the surge tank, and the verification tanks, which are outside the ETF, also are large enough to include the additional volume from a 100-year, 24-hour storm event; i.e., 5.3 centimeters of precipitation.

41 Sprinkler System. The sprinkler system within the ETF supplies fire 42 water protection to the process area. This system is connected to a sitewide 43 water supply system and has the capacity to supply at least 20 minutes of fire 44 water. However, in the event of failure, the sprinkler system can be hooked 45 up to another water source (e.g., tanker truck). 46

4.4.4.1.2 Specific Containment Systems. The following discussion
 48 presents a description of the individual containment systems associated with
 49 specific tank systems.
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51 Load-In Tank Secondary Containment. The load-in tanks are mounted on a 52 46-centimeter-thick reinforced concrete slab (Drawing H-2-817970,

Appendix 4B). Secondary containment is provided by a pit with 30.5-centimeter-thick walls and a floor constructed of reinforced concrete. The load-in tank pit is sloped to drain solution to a sump. The depth of the pit varies with the slope of the floor, with an average thickness of about 1.1 meters. The volume of the secondary containment is about 79,000 liters. which is capable of containing the volume of at least one load-in tank (i.e., 37,800 liters). Leaks are detected by a leak detector that alarms locally and in the ETF control room and by visual inspection of the secondary containment.

10 Adjacent to the pit is a 25.4-centimeter-thick reinforced concrete pad 11 that serves as secondary containment for the load-in tanker trucks and 12 transfer pumps. The pad is 15.2 centimeters below grade with north and south walls gently sloped to allow truck access. The pad has drain pipes to route 13 14 waste to the adjacent load-in tank pit. 15

Surge Tank Secondary Containment. The surge tank is mounted on a reinforced concrete ringwall. Inside the ringwall, the flat-bottomed tank is supported by a bed of compacted sand and gravel with a high-density polyethylene liner bonded to the ringwall. The liner prevents galvanic corrosion between the soil and the tank. The secondary containment is reinforced concrete with a 15.2-centimeter thick floor and a 20.3-centimeter thick dike. The secondary containment area shares part of the southern wall 23 of the main process area. The dike extends up 2.9 meters to provide a containment volume of 740,000 liters for the 379,000 liter surge tank.

The floor of the secondary containment slopes to a sump in the northwest corner of the containment area. Leaks into the secondary containment are detected by level instrumentation in the sump, which alarms in the ETF control room, and/or by routine visual inspections. A sump pump is used to transfer solution in the secondary containment to a sump tank.

32 Process Area Secondary Containment. The process area contains the tanks 33 and ancillary equipment of the primary and secondary treatment trains, and has a jointed, reinforced concrete slab floor. The concrete floor of the process area provides the secondary containment. This floor is a minimum of 15.2 centimeters thick. With door sills 15.2 centimeter high, the process 34 35 36 37 area has a containment volume of 76,200 liters. The largest tanks in the 38 process area are the secondary waste receiving tanks, which each have a 39 maximum capacity of 56,800 liters. 40

41 The floor of the process area is sloped to drain liquids to two trenches 42 that drain to a sump. Each trench is approximately 38.1 centimeters wide with a sloped trough varying from 39.4 to 76.2 centimeters deep. Leaks into the 43 secondary containment are detected by routine visual inspections of the floor 44 45 area near the tanks, ancillary equipment, and in the trenches. 46

47 The northwest corner of the process area consists of a pump pit containing the pumps and piping for transferring treated effluent from the 48 verification tanks to SALDS. The pit is built 1.37 meters below the process 49 area floor level and is sloped to drain to a trench built along its north wall 50 that routes liquid to sump tank 1. Leaks into the secondary containment of 51 52 the pump pit are detected by routine visual inspections.

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Sump Tanks. The sump tanks support the secondary containment system, and collect waste from several sources, including:

- Process area drain trenches
- Tank overflows and drains
- Container washing water
- Resin dewatering solution
- Steam boiler blowdown

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Sampler system drains.

11 These double-contained tanks are located within unlined. concrete vaults. 12 The sump tank levels are monitored by remote level indicators or through visual inspections from the sump covers. These indicators are connected to 13 high- and low-level alarms that are monitored in the control room. When a 14 15 high-level alarm is activated, a pump is activated and the sump tank contents usually are routed to the secondary treatment train for processing. The 16 17 contents also could be routed to the surge tank for treatment in the primary treatment train. In the event of an abnormally high inflow rate, a second 18 sump pump is initiated automatically. 19 20

Verification Tank Secondary Containment. The three verification tanks are each mounted on ringwalls with high-density polyethylene liners similar to the surge tank. The secondary containment for the three tanks is reinforced concrete with a 15.2-centimeter thick floor and a 20.3-centimeter thick dike. The dike extends up 2.6 meters to provide a containment of 110 percent of the capacity of a single tank (i.e., 2,800,000 liters).

The floor of the secondary containment slopes to a sump along the southern wall of the dike. Leaks into the secondary containment are detected by level instrumentation in the sump that alarms in the control room and/or by routine visual inspections. A sump pump is used to transfer solution in the secondary containment to a sump tank.

4.4.4.2 Additional Requirements for Specific Types of Systems [D-2b(2)].
 This section addresses additional requirements in WAC 173-303-640 for
 double-walled tanks like the sump tanks and secondary containment for
 ancillary equipment and piping associated with the tank systems.

39 4.4.4.2.1 Double-Walled Tanks [D-2b(2)(b)]. The sump tanks are the only 40 tanks in the ETF classified as 'double-walled' tanks. These tanks are located in unlined concrete vaults and support the secondary containment system for 41 the process area. The sump tanks are equipped with a leak detector between 42 the walls of the tanks that provide continuous monitoring for leaks. The leak 43 detector provides immediate notification through an alarm in the control room. 44 45 The inner tanks are contained completely within the outer shells. The tanks are contained completely within the concrete structure of the ETF so corrosion 46 protection from external galvanic corrosion is not necessary. 47

4.4.4.2.2 Ancillary Equipment [D-2b(2)(c)]. The secondary containment
 provided for the tanks and process systems also serves as secondary
 containment for the ancillary equipment associated with these systems.

Ancillary Equipment. Section 4.4.5.1 describes the secondary containment systems that also serve most of the ancillary equipment within the ETF. Between the ETF and the verification tanks, a pipeline trench provides secondary containment for four pipelines connecting the transfer pumps (i.e., discharge and return pumps) in the ETF with the verification tanks (Figure 4-1). This concrete trench crosses under the road and extends from the verification tank pumps to the verification tanks. Treated effluent flows through these pipelines from the verification tank pumps to the verification tanks. The return pump is used to return effluent to the ETF for use as service water or for reprocessing.

For all of the ancillary equipment housed within the ETF, the concrete floor, trenches, and berms form the secondary containment system. For the ancillary equipment of the surge tank and the verification tanks, secondary containment is provided by the concrete floors and dikes associated with these tanks. The concrete floor and pit provide secondary containment for the ancillary equipment of the load-in tanks.

Transfer Piping and Pipe Trenches. The two buried transfer lines between LERF and the surge tank have secondary containment in a pipe-within-a-pipe arrangement. The 4-inch transfer line has an 8-inch outer pipe, while the 3-inch transfer line has a 6-inch outer pipe. The pipes are fiberglass and are sloped towards the surge tank. The outer piping ends with a drain valve in the surge tank secondary containment.

These pipelines are equipped with leak detection located in the annulus between the inner and outer pipes, which have the ability to continuously 28 'inspect' the pipelines during aqueous waste transfers. The alarms on the leak detection system are monitored in the control room. In the event that these leak detectors are not in service, the pipelines are inspected during transfers by opening a drain valve to check for solution in the annular space between the inner and outer pipe.

34 The 3-inch transfer line between the load-in tanks and the surge tank has 35 a 6-inch outer pipe in a pipe-within-a-pipe arrangement. The piping is made 36 of fiberglass reinforced plastic and slopes towards the load-in tank secondary 37 containment pit. The drain valve and leak detection system for the load-in 38 tank pipelines are operated similarly to the leak detection system for the 39 LERF to ETF pipelines. 40

41 As previously indicated, there are four reinforced concrete pipe trenches 42 that provide secondary containment for piping under the roadway between the ETF and the verification tanks. Each trench is 1.2 meters wide and 0.76 meter 43 deep and slopes towards the sump containing the transfer pumps to SALDS. The 44 45 floor of the trenches are 30.5 centimeters thick and the sides are 46 15.2 centimeters thick. The concrete trenches are coated with water sealant 47 and covered with metal gratings at ground level to allow vehicle traffic on 48 the roadway. 49

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4.4.5 Tank Management Practices [D-2d]

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When an aqueous waste stream is identified for treatment or storage at ETF, the generating unit is required to characterize the waste. Based on characterization data, the waste stream is evaluated to determine if the stream is acceptable for treatment or storage. Specific tank management practices are discussed in the following sections.

9 4.4.5.1 Rupture, Leakage, Corrosion Prevention. Most aqueous waste streams 10 can be managed such that corrosion would not be a concern. For example, an aqueous waste stream with high concentrations of chloride might cause 11 corrosion problems when concentrated in the secondary treatment train. One 12 approach is to adjust the corrosion control measures in the secondary 13 treatment train. An alternative might be to blend this aqueous waste in a 14 15 LERF basin with another aqueous waste that has sufficient dissolved solids, 16 such that the concentration of the chlorides in the secondary treatment train 17 would not pose a corrosion concern. 18

Additionally, the materials of construction used in the tanks systems (Table 4-1) make it unlikely that a aqueous waste would corrode a tank. For more information on corrosion prevention, refer to the waste analysis plan (Appendix 3A).

24 When a leak in a tank system is discovered, the leak is immediately contained or stopped by isolating the leaking component. Following 25 26 containment, the leaking tank system is evaluated by facility personnel to 27 determine whether continued operation of affected system would jeopardize the 28 safety of plant personnel, result in a release to the environment, or compromise facility equipment. If it is determined that a leak could have the 29 30 aforementioned consequences, the affected system will be immediately removed 31 from service until repairs can be implemented. If a leak would not result in the stated consequences, the tank system will be placed on a maintenance 32 33 schedule for repair. 34

4.4.5.2 Overfilling Prevention. Operating practices and administrative 35 controls used at the ETF to prevent overfilling a tank are discussed in the 36 following paragraphs. The ETF process is controlled by the MCS. The MCS 37 monitors liquid levels in the ETF tanks and has alarms that annunciate on 38 high-liquid level to notify operators that actions must be taken to prevent 39 40 overfilling of these vessels. As an additional precaution to prevent spills, many tanks are equipped with overflow lines that route solutions to sump 41 tanks 1 and 2. These tanks include the pH adjustment tank, RO feed tanks, 42 effluent pH adjustment tank, secondary waste receiving tanks, and concentrate 43 44 tanks. 45

The following section discusses feed systems, safety cutoff devices,
 bypass systems, and pressure controls for specific tanks and process systems.

49 **Tanks.** All tanks are equipped with liquid level sensors that give a 50 reading of the tank liquid volume. The surge tank, the verification tanks, 51 the RO tanks, the secondary waste receiving tanks, and the concentrate tanks 52 are equipped further with liquid level alarms that are actuated if the liquid volume is near the tank overflow capacity. In the actuation of the surge tank alarm, a liquid level switch trips, sending a signal to the valve actuator on the tank influent lines, causing the influent valves to close.

The operating mode for each verification tank, i.e., receiving, holding, or discharging, can be designated through the MCS; modes also switch automatically. When the high-level set point on the receiving verification tank is reached, the flow to this tank is diverted and another tank becomes the receiver. The full tank is switched into verification mode. The third tank is reserved for discharge mode.

The liquid levels in the first and second RO feed tanks are maintained within predetermined operating ranges. Should the second RO feed tank overflow, the excess waste is piped along with any leakage from the feed pump to a sump tank.

When waste in a secondary waste receiving tank reaches the high-level set point, the influent flow of waste is redirected to the second tank and the first tank becomes the feed tank for the ETF evaporator.

In a similar fashion, the concentrate tanks switch modes when the high-level set point of one tank is reached. The other tank switches from a discharging mode to a receiving mode and the first tank becomes the discharge tank feeding waste to the thin film dryer.

26 Filter Systems. Both the rough filter and fine filter are in leak-tight 27 steel casings. A high differential pressure, which could damage the filter element, deactivates a valve that shuts off liquid flow to protect the filter 28 element from possible damage. To prevent a high pressure situation, the 29 30 filters are cleaned routinely with pulses of compressed air that force water back through the filter. Cleaning is terminated automatically by shutting off 31 the compressed air supply if high pressure develops. The differential 32 33 pressure across the auxiliary filters also is monitored. A high differential 34 pressure in these filters would result in a system shutdown to allow the 35 filters to be changed out.

37 Ultraviolet Light/Oxidation System and Decomposers. A rupture disk on 38 the inlet piping to each of the UV/OX reaction vessels relieves to the pH 39 adjustment tank in the event of excessive pressure developing in the piping system. Should the rupture disk fail, the aqueous waste would trip the 40 41 moisture sensor, shut down the UV lamps, and close the surge tank feed valve. Also provided is a level sensor to protect UV lamps against the risk of 42 exposure to air. Should those sensors be actuated, the UV lamps would be shut 43 44 down immediately. 45

The piping and valving for the hydrogen peroxide decomposers are configured to split the waste flow: half flows to one decomposer and half flows to the other decomposer. Alternatively, the total flow of waste can be treated in one decomposer or both decomposers can be bypassed. A safety relief valve on each decomposer vessel can relieve excess system pressure to a sump tank.

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Degasification System. The degasification column is typically supplied aqueous waste feed by the pH adjustment tank feed pump. This pump transfers waste solution through the hydrogen peroxide decomposer, the fine filter, and the degasification column to the first RO feed tank.

6 The degasification column is designed for operation at a partial vacuum. 7 A pressure sensor in the column detects the column pressure. The vacuum in the column is regulated by the pressure controller that adjusts the opening of 8 9 the air supply valve. The degasification column is exhausted to a blower connected to the vessel offgas system. If extremely low pressure is developed 10 by the column blower, a situation that could compromise column integrity, a 11 pressure relief safety valve is activated. The column liquid level is 12 regulated by a flow control system with a high- and low-level alarm. A 13 plate-type heat exchanger cools the waste solution fed to the degasification 14 15 column.

17 Reverse Osmosis System. The flow through the first and second RO stages 18 is controlled to maintain constant liquid levels in the first and second stage 19 RO feed tanks. 20

Polisher. Typically, two of the three columns are in operation 21 (lead/lag) and the third (regenerated) column is in standby. When the 22 23 capacity of the resin in the first column is exceeded, as detected by an 24 increase in the conductivity of the column effluent, the third column, 25 containing freshly regenerated IX resin, is brought online. The first column is taken offline, and the waste is rerouted to the second column, and to the 26 third. Liquid level instrumentation and automatically operated valves are 27 provided in the IX system to prevent overfilling. 28 29

30 Effluent Treatment Facility Evaporator. Liquid level instrumentation in 31 the secondary waste receiving tanks is designed to preclude a tank overflow. 32 A liquid level switch actuated by a high-tank liquid level causes the valves 33 to reposition, closing off flow to the secondary waste receiving tanks. 34 Secondary containment for these tanks routes liquids to a sump tank. 35

Valves in the ETF evaporator feed line can be positioned to bypass the secondary waste around the ETF evaporator and to transfer the secondary waste to the concentrate tanks.

40 **Thin Film Dryer.** The two concentrate tanks alternately feed the thin 41 film dryer. One tank serves as a concentrate waste receiver while the other 42 tank serves as the dryer feed tank. Liquid level instrumentation prevents 43 tank overflow by diverting the concentrate flow from the full concentrate tank 44 to the other concentrate tank. Secondary containment for these tanks routes 45 liquids to a sump tank.

An alternate route is provided from the concentrate receiver tank to the
 secondary waste receiving tanks. Dilute concentrate in the concentrate
 receiver tank can be reprocessed through the ETF evaporator by transferring
 the concentrate back to a secondary waste receiving tank.

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4.4.6 Labels or Signs [D-2e]

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Each piece of process equipment in the ETF is identified by a nameplate attached in a readily visible location. Equipment procured as a packaged unit also has a nameplate attached. Included on the nameplate are the equipment number, the equipment title, the manufacturer and the manufacturer's model number, a serial number, and a rating (i.e., capacity, revolutions per minute, torque, range, span, etc.).

10 Caution plates are used to show possible hazards and warn that precautions are necessary. Caution signs have a yellow background and black 11 12 panel with yellow letters and bear the word "CAUTION". Danger signs show 13 immediate danger and signify that special precautions are necessary. These signs are red, black, and white and bear the word "DANGER". 14 15

Tanks and vessels containing corrosive waste or corrosive chemicals are 17 posted with black and white signs bearing the word "CORROSIVE". "DANGER -UNAUTHORIZED PERSONNEL KEEP OUT" signs are posted on all exterior doors of the 18 19 ETF, and on each interior door leading into the process area. Tank ancillary 20 piping is labeled "PROCESS WATER" to alert personnel which pipes in the process area contain dangerous and/or mixed waste.

4.4.7 Air Emissions [D-2f]

Tank systems that contain extremely hazardous waste that is acutely toxic by inhalation must be designed to prevent the escape of such vapors. To date, no extremely hazardous waste has been managed in ETF tanks and is not anticipated. However, the ETF tanks have forced ventilation that draws air from the tank vapor spaces to prevent exposure of operating personnel to any toxic vapors that might be present. The vapor passes through a charcoal filter and two sets of high-efficiency particulate air filters before discharge to the environment.

35 36 4.4.8 Management of Ignitible or Reactive Wastes in Tanks Systems [D-2g]

37 Although the ETF is permitted to accept waste that is designated 38 ignitible or reactive, such waste would be treated or blended immediately 39 40 after placement in the tank system so that the resulting waste mixture is no 41 longer ignitible or reactive. Aqueous waste received does not meet the 42 definition of a combustible or flammable liquid given in National Fire 43 Protection Association (NFPA) code number 30 (NFPA 1996). The buffer zone 44 requirements in NFPA-30, which require tanks containing combustible or flammable solutions be a safe distance from each other and from public way, 45 are not applicable. 46

49 4.4.9 Management of Incompatible Wastes in Tanks Systems [D-2h]

The ETF manages dilute solutions that can be mixed without compatibility issues. The ETF is equipped with several systems that can adjust the pH of

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1 the waste for treatment activities. Sulfuric acid and sodium hydroxide are 2 added to the process through the MCS for pH adjustment to ensure there will be 3 no large pH fluctuations and adverse reactions in the tank systems.

4.5 SURFACE IMPOUNDMENTS [173-303-806-(4)(d)]

8 This section provides specific information on surface impoundment 9 operations at the LERF, including descriptions of the liners and secondary 10 containment structures, as required by WAC 173-303-650 and 11 WAC 173-303-806(4)(d).

13 The LERF consists of three lined surface impoundments (basins) with a 14 design capacity of 24.6 million liters each. The maximum capacity of each 15 basin is 34 million liters. The dimensions of each basin at the anchor wall are approximately 103 meters by 85 meters. The typical top dimensions of the 16 wetted area are approximately 89 meters by 71 meters, while the bottom 17 dimensions are approximately 57 by 38 meters. Total depth from the top of the 18 19 dike to the bottom of the basin is approximately 7 meters. The typical finished basin bottoms lie at about 4 meters below the initial grade and 175 20 meters above sea level. The dikes separating the basins have a typical height 21 22 of 3 meters and typical top width of 11.6 meters around the perimeter of the 23 impoundments. 24

4.5.1 List of Dangerous Waste [806(4)(d)(i)]

A list of dangerous and/or mixed aqueous waste that can be stored in LERF presented in Chapter 1.0. The waste analysis plan for the LERF and ETF (Appendix 3A) also provides a discussion of the types of waste that are managed in the LERF. 22

34 4.5.2 Construction, Operation, and Maintenance of Liner System 35 [806(4)(d)(ii)(A)] 36

General information concerning the liner system is presented in the
following sections. Information regarding loads on the liner, liner coverage,
UV light exposure prevention, and location relative to the water table also
are discussed.

42 4.5.2.1 Liner Construction Materials [650(2)(a)(i)(A)]. The LERF employs a double-composite liner system with a leachate detection, collection, and 43 removal system between the primary and secondary liners. Each basin is 44 constructed with an upper or primary liner consisting of a high-density 45 polyethylene geomembrane laid over a bentonite carpet liner. The lower or 46 secondary liner in each basin is a composite of a geomembrane laid over a 47 48 laver of soil/bentonite admixture with a hydraulic conductivity less than $10^{\ensuremath{\,^{\prime\prime}}}$ centimeters per second. The synthetic liners extend up the dike wall to 49 a concrete anchor wall that completely surrounds the basin at the top of the 50 dike. A batten system bolts the layers in place to the anchor wall 51 52 (Figure 4-15).

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Figure 4-16 is a schematic cross-section of the liner system. The liner components, listed from the top to the bottom of the liner system, are the following:

- Primary 1.5-millimeter high-density polyethylene geomembrane
- Bentonite carpet liner
- Gentextile

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- Drainage gravel (bottom) and geonet (sides)
- Geotextile
- Secondary 1.5-millimeter high-density polyethylene geomembrane
- Soil/bentonite admixture (91 centimeters on the bottom. 107 centimeters on the sides)
- Geotextile.

The primary geomembrane, made of 1.5-millimeter high-density 23 polyethylene, forms the basin surface that holds the aqueous waste. The secondary geomembrane, also 1.5-millimeter high-density polyethylene, forms a barrier surface for leachate that might penetrate the primary liner. The high-density polyethylene chemically is resistant to constituents in the aqueous waste and has a relatively high strength compared to other lining materials. The high-density polyethylene resin specified for the LERF contains carbon black, antioxidants, and heat stabilizers to enhance its resistance to the degrading effects of UV light. The approach to ensuring the compatibility of aqueous waste streams with the LERF liner materials and piping is discussed in the waste analysis plan (Appendix 3A).

34 Three geotextile layers are used in the LERF liner system. The layers 35 are thin, nonwoven polypropylene fabric that chemically are resistant, highly 36 permeable, and resistant to microbiological growth. The first two layers prevent fine soil particles from infiltrating and clogging the drainage layer. 37 38 The second geotextile also provides limited protection for the secondary 39 geomembrane from the drainage rock. The third geotextile layer prevents the mixing of the soil/bentonite admixture with the much more porous and granular 40 41 foundation material. 42

43 A 30.5-centimeters-thick gravel drainage layer on the bottom of the 44 basins between the primary and secondary liners provides a flow path for 45 liquid to the leachate detection, collection, and removal system. A geonet 46 (or drainage net) is located immediately above the secondary geomembrane on 47 the basin sidewalls. The geonet functions as a preferential flow path for 48 liquid between the liners, carrying liquid down to the gravel drainage layer 49 and subsequently to the leachate sump. The geonet is a mesh made of high-50 density polyethylene, with approximately 13-millimeter openings. 51

The soil/bentonite layer is 97 centimeters thick on the bottom of the 2 basins and 107 centimeters thick on the basin sidewalls; its permeability is less than 10⁻⁷ centimeters per second. This composite liner design, 3 4 consisting of a geomembrane laid over essentially impermeable soil/bentonite. is considered best available technology for solid waste landfills and surface impoundments. The combination of synthetic and clay liners is reported in the literature to provide the maximum protection from waste migration (Forseth and Kmet 1983). 9

10 A number of laboratory tests were conducted to measure the engineering 11 properties of the soil/bentonite admixture, in addition to extensive field 12 tests performed on three test fills constructed near the LERF site. For the 13 purpose of establishing an optimum ratio of bentonite to soil for the 14 soil/bentonite admixture, mixtures of various ratios were tested to determine 15 permeability and shear strength. A mixture of 12 percent bentonite was 16 selected for the soil/bentonite liner and tests described in the following 17 paragraphs demonstrated that the admixture meets the desired permeability of less than 10⁻⁷ centimeters per second. Detailed discussion of test procedures 18 and results is provided in Report of Geotechnical Investigation, 19 20 242-A Evaporation and PUREX Interim Storage Basins (Chen-Northern 1990). 21

22 Direct shear tests were performed according to ASTM D3080 test procedures 23 (ASTM 1990) on soil/bentonite samples of various ratios. Based on these 24 results, the conservative minimum Mohr-Coulomb shear strength value of 25 30 degrees was estimated for a soil/bentonite admixture containing 12 percent 26 bentonite. 27

28 The high degree of compaction of the soil/bentonite layer [92 percent per 29 ASTM D1557 (ASTM 1991)] was expected to maximize the bonding forces between 30 the clay particles, thereby minimizing moisture transport through the liner. With respect to particle movement ('piping'), estimated fluid velocities in this low-permeability material are too low to move the soil particles. 31 32 33 Therefore, piping is not considered a problem. 34

35 For the soil/bentonite layer, three test fills were constructed to 36 demonstrate that materials, methods, and procedures used would produce a 37 soil/bentonite liner that meets the EPA permeability requirement of less than 38 10⁻⁷ centimeters per second. All test fills met the EPA requirements. A 39 thorough discussion of construction procedures, testing, and results is 40 provided in Report of Permeability Testing, Soil-bentonite Test Fill (Chen-Northern 1991a). 41

42 43 The aqueous waste stored in the LERF is typically a dilute mixture of organic and inorganic constituents. Though isolated instances of soil liner 44 45 incompatibility have been documented in the literature (Forseth and 46 Kmet 1983), these instances have occurred with concentrated solutions that were incompatible with the geomembrane liners in which the solutions were 47 contained. Considering the dilute nature of the aqueous waste that is and 48 will be stored in LERF and the moderate pH, and test results demonstrating the 49 50 compatibility of the high-density polyethylene liners with the aqueous waste [9090 Test Results (WHC 1991)], gross failure of the soil/bentonite layer is 51 52 not probable.

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Each basin also is equipped with a floating very low-density polyethylene cover. The cover is anchored and tensioned at the concrete wall at the top of the dikes, using a patented mechanical tensioning system. Figure 4-15 depicts the tension mechanism and the anchor wall at the perimeter of each basin. Additional information on the cover system is provided in Section 4.5.2.5.

4.5.2.1.1 Material Specifications. Material specifications for the liner system and leachate collection system, including liners, drainage gravel, and drainage net are discussed in the following sections. Material specifications are documented in the Final Specifications 242-A Evaporator and PUREX Interim Retention Basins (KEH 1990a) and Construction Specifications for 242-A Evaporator and PUREX Interim Retention Basins (KEH 1990b).

Geomembrane Liners. The high-density polyethylene resin for geomembranes for the LERF meets the material specifications listed in Table 4-4. Key physical properties include thickness (1.5 millimeters [60 mill) and impermeability (hydrostatic resistance of over 360,000 kilogram per square 18 meter). Physical properties meet National Sanitation Foundation Standard 54 (NSF 1985). Testing to determine if the liner material is compatible with typical dilute waste solutions was performed and documented in 9090 Test Results (WHC 1991).

Soil/Bentonite Liner. The soil/bentonite admixture consists of 11.5 to 14.5 percent bentonite mixed into well-graded silty sand with a maximum particle size of 4.75 millimeters (No. 4 sieve). Test fills were performed to confirm the soil/bentonite admixture applied at LERF has hydraulic conductivity less than 10^{-7} centimeters per second, as required by WAC 173-303-650(2)(j) for new surface impoundments.

30 Bentonite Carpet Liner. The bentonite carpet liner consists of bentonite (90 percent sodium montmorillonite clay) in a primary backing of woven polypropylene with nylon filler fiber, and a cover fabric of open weave spunlace polyester. The montmorillonite is anticipated to retard migration of 33 34 solution through the liner, exhibiting a favorable cation exchange for 35 adsorption of some constituents (such as ammonium). Based on composition of 36 the bentonite carpet and of the type of aqueous waste stored at LERF, no chemical attack, dissolution, or degradation of the bentonite carpet liner is 38 anticipated. 39

40 Geotextile. The nonwoven geotextile layers consist of long-chain 41 polypropylene polymers containing stabilizers and inhibitors to make the 42 filaments resistant to deterioration from UV light and heat exposure. The 43 geotextile layers consist of continuous geotextile sheets held together by 44 needle-punching. Edges of the fabric are sealed or otherwise finished to 45 prevent outer material from pulling away from the fabric or ravelling.

47 Drainage Gravel. The drainage layer consists of thoroughly washed and 48 screened, naturally occurring rock meeting the size specifications for Grading Number 5 in Washington State Department of Transportation construction 49 50 specifications (WSDOT 1988). The specifications for the drainage layer are given in Table 4-5. Hydraulic conductivity tests (Chen-Northern 1992a, 1992b, 1992c) showed the drainage rock used at LERF met the sieve requirements and

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had a hydraulic conductivity of at least 1 centimeter per second, which 1 exceeded the minimum of at least 0.1 centimeters per second required by 2 3 WAC 173-303-650(2)(j) for new surface impoundments. 4 5 6 **Geonet.** The geonet is fabricated from two sets of parallel high-density polyethylene strands, spaced 1.3 centimeters center-to-center maximum to form 7 a mesh with minimum two strands per 2.54 centimeter in each direction. The geonet is located between the liners on the sloping sidewalls to provide a 8 preferential flow path for leachate to the drainage gravel and subsequently to 9 10 the leachate sump. 11 12 Leachate Collection Sump. Materials used to line the 3.0-meter by 13 14

1.8-meter by 0.30-meter-deep leachate sump, at the bottom of each basin in the northwest corner, include [from top to bottom (Figure 4-17)]:

- 25 millimeter high-density polyethylene flat stock (supporting the leachate riser pipe)
- Geotextile

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- 1.5-millimeter high-density polyethylene rub sheet
- Secondary composite liner:
 - 1.5-millimeter high-density polyethylene geomembrane
 - 91 centimeters of soil/bentonite admixture
 - Geotextile.
- Specifications for these materials are identical to those discussed 28 29 previously. 30

31 Leachate System Risers. Risers for the leachate system consist of 10-inch and 4-inch pipes from the leachate collection sump to the catch basin 32 northwest of each basin (Figure 4-17). The risers lay below the primary liner 33 in a gravel-filled trench which also extends from the sump to the concrete 34 35 catch basin (Figure 4-18).

The risers are high-density polyethylene pipes fabricated to meet the 37 requirements in ASTM D1248 (ASTM 1989). The 10-inch riser is perforated every 38 20.3 centimeters with 1.3-centimeter holes around the diameter. Level sensors 39 40 and leachate pump are inserted in the 10-inch riser to monitor and remove leachate from the sump. To prevent clogging of the pump and piping with fine 41 particulate, the end of the riser is encased in a gravel-filled box 42 43 constructed of high-density polyethylene geonet and wrapped in geotextile. The 4-inch riser is perforated every 10.2 centimeters with 0.64-centimeter 44 holes around the diameter. A level detector is inserted in the 4-inch riser. 45 46

47 Leachate Pump. A deep-well submersible pump, designed to deliver approximately 110 liters per minute, is installed in the 10-inch leachate 48 riser in each basin. Wetted parts of the leachate pump are made of 49 50 316L stainless steel, providing both corrosion resistance and durability. 51

4.5.2.1.2 Loads on Liner System. The LERF liner system is subjected to the following types of stresses.

Stresses from Installation or Construction Operations. Contractors were required to submit construction quality control plans that included procedures, techniques, tools, and equipment used for the construction and care of liner and leachate system. Methods for installation of all components were screened to ensure that the stresses on the liner system were kept to a minimum.

11 Calculations were performed to estimate the risk of damage to the secondary high-density polyethylene liner during construction (Calculations 12 for LERF Part B Permit Application [HNF 1997]). The greatest risk expected 13 14 was from spreading the gravel layer over the geotextile layer and secondary 15 geomembrane. The results of the calculations show that the strength of the 16 geotextile was sufficiently high to withstand the stress of a small gravel 17 spreader driving on a minimum of 15 centimeters of gravel over the geotextile 18 and geomembrane. The likelihood of damage to the geomembrane lying under the 19 geotextile was considered to be low. 20

To avoid driving heavy machinery directly on the secondary liner, a 28-meter conveyer was used to deliver the drainage gravel into the basins. The gravel was spread and consolidated by hand tools and a bulldozer. The bulldozer traveled on a minimum thickness of 30.5 centimeters of gravel. Where the conveyer assembly was placed on top of the liner, cribbing was placed to distribute the conveyer weight. No heavy equipment was allowed for use directly in contact with the geomembranes.

Additional calculations were performed to estimate the ability of the leachate riser pipe to withstand the static and dynamic loading imposed by lightweight construction equipment riding on the gravel layer (HNF 1997). Those calculations demonstrated that the pipe could buckle under the dynamic loading of small construction equipment; therefore, the pipe was avoided by equipment during spreading of the drainage gravel.

36 Installation of synthetic lining materials proceeded only when winds 37 were less than 24 kilometers per hour, and not during precipitation. The 38 minimum ambient air temperature for unfolding or unrolling the high-density 39 polyethylene sheets was -10° C, and a minimum temperature of 0°C was required 40 for seaming the high-density polyethylene sheets. Between shifts, 41 geomembranes and geotextile were anchored with sandbags to prevent lifting by wind. Calculations were performed to determine the appropriate spacing of 42 43 sandbags on the geomembrane to resist lifting caused by 130 kilometer per hour winds (HNF 1997). All of the synthetic components contain UV light inhibitors 44 45 and no impairment of performance is anticipated from the short-term UV light exposure during construction. Section 4.5.2.5 provides further detail on 46 47 exposure prevention. 48

During laying of the soil/bentonite layer and the overlying geomembrane, moisture content of the admixture was monitored and adjusted to ensure optimum compaction and to avoid development of cracks.

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4.5.2.1.3 Static and Dynamic Loads and Stresses from the Maximum Quantity of Waste. When a LERF basin is full, liquid depth is approximately 6.4 meters. Static load on the primary liner is roughly 6,400 kilograms per 4 square meter. Load on the secondary liner is slightly higher because of the weight of the gravel drainage layer. Assuming a density of 805 kilograms per square meter for the drainage gravel [conservative estimate based on specific 7 gravity of 2.65 (Ambrose 1988)], the secondary high-density polyethylene 8 carries approximately 7,200 kilograms per square meter when a basin is full. 9

10 Sideslope liner stresses were calculated for each of the layers in the 11 basin sidewalls and for the pipe trench on the northwest corner of each basin (HNF 1997). Results of these calculations indicate factors of safety against 12 13 shear were 1.5 or greater for the primary geomembrane, geotextile, geonet, and 14 secondary geomembrane. 15

16 Because the LERF is not located in an area of seismic concern, as 17 identified in Appendix VI of 40 CFR 264 and WAC 173-303-282(6)(a)(i). discussion and calculation of potential seismic events are not required.

20 4.5.2.1.4 Stresses Resulting from Settlement, Subsidence, or Uplift. 21 Uplift stresses from natural sources are expected to have negligible impact on 22 the liner. Groundwater lies approximately 62 meters below the LERF, average 23 annual precipitation is only 16 centimeters, and the average unsaturated 24 permeability of the soils near the basin bottoms is high, ranging from about 25 5.5×10^{-4} centimeters per second to about 1 centimeter per second 26 (Chen-Northern 1991b). Therefore, no hydrostatic uplift forces are expected to develop in the soil underneath the basins. In addition, the soil under the basins consists primarily of gravel and sand, and contains few or no organic 27 28 29 constituents. Therefore, uplift caused by gas production from organic 30 degradation is not anticipated. 31

Based on the design of the soil-bentonite liner, no structural uplift stresses are present within the lining system (Chen-Northern 1991b).

35 Regional subsidence is not anticipated because neither petroleum nor 36 extractable economic minerals are present in the strata underlying the LERF 37 basins, nor is karst (erosive limestone) topography present. 38

39 Dike soils and soil/bentonite layers were compacted thoroughly and 40 proof-rolled during construction. Calculation of settlement potential showed that combined settlement for the foundation and soil/bentonite layer is 41 expected to be about 2.7 centimeters. Settlement impact on the liner and 42 43 basin stability is expected to be minimal (Chen-Northern 1991b).

4.5.2.1.5 Internal and External Pressure Gradients. Pressure gradients 45 across the liner system from groundwater are anticipated to be negligible. 46 The LERF is about 62 meters above the seasonal high water table, which 47 prevents buildup of water pressure below the liner. The native gravel 48 foundation materials of the LERF are relatively permeable and free draining. 49 50 The 2 percent slope of the secondary liner prevents the pooling of liquids on top of the secondary liner. Finally, the fill rate of the basins is slow 51

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enough (average 190 liters per minute) that the load of the liquid waste on the primary liner is gradually and evenly distributed.

To prevent the buildup of gas between the liners, each basin is equipped with 21 vents in the primary geomembrane that allow the reduction of any excess gas pressure. Gas passing through these vents exit through a single pipe that penetrates the anchor wall into a carbon adsorption filter. This filter extracts nearly all of the organic compounds, ensuring that emissions to the air from the basins are not toxic.

11 4.5.2.2 Liner System Location Relative to High-Water Table. The lowest point 12 of each LERF basin is the northwest corner of the sump, where the typical 13 subgrade elevation is 175 meters above mean sea level. Based on data collected from the groundwater monitoring wells at the LERF site, the seasonal 14 high-water table is located approximately 62 meters or more below the lowest 15 16 point of the basins. This substantial thickness of unsaturated strata beneath 17 the LERF provides ample protection to the liner from hydrostatic pressure 18 because of groundwater intrusion into the soil/bentonite layer. Further 19 discussion of the unsaturated zone and site hydrogeology is provided in 20 Chapter 5.0. 21

4.5.2.3 Liner System Foundation [650(2)(a)(i)(B)]. Foundation materials are primarily gravels and cobbles with some sand and silt. The native soils onsite are derived from unconsolidated Holocene sediments. These sediments are fluvial and glaciofluvial sands and gravels deposited during the most recent glacial and postglacial event. Grain-size distributions and shape analyses of the sediments indicate that deposition occurred in a high energy environment (Chen-Northern 1990).

30 Analysis of five soil borings from the LERF site was conducted to 31 characterize the natural foundation materials and to determine the suitability of onsite soils for construction of the impoundment dikes and determine 32 33 optimal design factors. Well-graded gravel containing varying amounts of 34 silt, sand, and cobbles comprises the layer in which the basins were 35 excavated. This gravel layer extends to depths of 10 to 11 meters below land 36 surface (Chen-Northern 1990). The basins are constructed directly on the subgrade. Excavated soils were screened to remove oversize cobbles (greater 37 38 than 15 centimeters in the largest dimension) and used to construct the dikes. 39

40 Settlement potential of the foundation material and soil/bentonite layer 41 was found to be low. The foundation is comprised of undisturbed native soils. The bottom of the basin excavation lies within the well-graded gravel layer, 42 and is dense to very dense. Below the gravel is a layer of dense to very 43 dense poorly-graded and well-graded sand. Settlement was calculated for the 44 gravel foundation soils and for the soil/bentonite layer, under the condition 45 of hydrostatic loading from 6.4 meters of fluid depth. The combined 46 settlement for the soils and the soil/bentonite layer is estimated to be about 47 48 2.7 centimeters. This amount of settlement is expected to have minimal impact on overall liner or basin stability (Chen-Northern 1991b). Settlement 49 calculations are provided in Calculations for Liquid Effluent Retention 50 51 Facility Part B Permit Application (HNF 1997). 52

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The load bearing capacity of the foundation material, based on the soil analysis discussed previously, is estimated at about 48,800 kilograms per square meter [maximum advisable presumptive bearing capacity (Hough 1969)]. Anticipated static and dynamic loading from a full basin is estimated to be less than 9,000 kilograms per square meter (Section 4.5.2.1.3), which provides an ample factor of safety.

8 When the basins are empty, excess hydrostatic pressure in the foundation 9 materials under the liner system theoretically could result in uplift and 10 damage. However, because the native soil forming the foundations is unsaturated and relatively permeable, and because the water table is located 11 12 at a considerable depth beneath the basins, any infiltration of surface water 13 at the edge of the basin is expected to travel predominantly downward and away from the basins, rather than collecting under the excavation itself. No gas 14 15 is expected in the foundation because gas-generating organic materials are not 16 present. 17

18 Subsidence of undisturbed foundation materials is generally the result of 19 fluid extraction (water or petroleum), mining, or karst topography. Neither petroleum, mineral resources, nor karst are believed to be present in the 20 21 sediments overlying the Columbia River basalts. Potential groundwater 22 resources do exist below the LERF. Even if these sediments were to consolidate from fluid withdrawal, their depth most likely would produce a 23 24 broad, gently sloping area of subsidence that would not cause significant 25 strains in the LERF liner system. Consequently, the potential for subsidence 26 related failures is expected to be negligible. 27

Borings at the LERF site, and extensive additional borings in the 200 East Area, have not identified any significant quantities of soluble 30 materials in the foundation soil or underlying sediments (Last et al. 1989). 31 Consequently, the potential for sinkholes is considered negligible. 32

33 4.5.2.4 Liner System Exposure Prevention. Both primary and secondary 34 geomembranes and the floating cover are stabilized with carbon black to 35 prevent degradation from UV light. Furthermore, none of the liner layers 36 experience long-term exposure to the elements. During construction, thin polyethylene sheeting was used to maintain optimum moisture content and 37 provide protection from the wind for the soil/bentonite layer until the 38 39 secondary geomembrane was laid in place. The secondary geomembrane was 40 covered by the geonet and geotextile as soon as quality control testing was 41 complete. Once the geotextile layer was completed, drainage material 42 immediately was placed over the geotextile. The final (upper) geotextile 43 layer was placed over the drainage gravel and immediately covered by the 44 bentonite carpet liner. This was covered immediately, in turn, by the primary 45 high-density polyethylene liner.

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Both high-density polyethylene liners, geotextile layers, and geonet are anchored permanently to a concrete wall at the top of the basin berm. During construction, liners were held in place with many sandbags on both the basin bottoms and sideslopes to prevent wind from lifting and damaging the materials. Calculations were performed to determine the amount of fluid peeded in a basin to prevent wind lift damage to the primary geomembrane. Approximately 15 to 20 centimeters of solution are kept in each basin to minimize the potential for uplifting the primary liner (HNF 1997).

4 The entire lining system is covered by a very low-density polyethylene floating cover that is bolted to the concrete anchor wall. The floating cover prevents evaporation and intrusion from dust, precipitation, vegetation, animals, and birds. A patented tensioning system is employed to prevent wind 7 8 from lifting the cover and to automatically accommodate changes in liquid 9 level in the basins. The cover tension mechanism consists of a cable running 10 from the flexible geosynthetic cover over a pulley on the tension tower 11 (located on the concrete anchor wall) to a deadman anchor. These anchors 12 (blocks) simply hang from the cables on the exterior side of the tension 13 towers. The anchor wall also provides for solid attachment of the liner layers and the cover, using a 6.4-millimeter batten and neoprene gasket to 14 15 bolt the layers to the concrete wall, effectively sealing the basin from the 16 intrusion of light, precipitation, and airborne dust (Figure 4-15). 17

The floating cover, made of very low-density polyethylene with UV light inhibitors, is anticipated to experience no unacceptable degradation during the service life of the LERF. The very low-density polyethylene material contains carbon black for UV light protection, anti-oxidants to prevent heat degradation, and seaming enhancers to improve its ability to be welded. A typical manufacturer's limited warranty for weathering of very low-density polyethylene products is 20 years (Poly America, undated). This provides a margin of safety for the anticipated medium-term use of the LERF for aqueous waste storage.

The upper 3.4 to 4.6 meters of the sidewall liner also could experience stresses in response to temperature changes. Accommodation of thermal influences for the LERF geosynthetic layers is affected by inclusion of sufficient slack as the liners were installed. Calculations demonstrate that approximately 67 centimeters of slack is required in the long basin bottom dimension, 46 centimeters across the basin, and 34 centimeters from the bottom of the basin to the top of the basin wall (HNF 1997).

36 Thermal stresses also are experienced by the floating cover. As with the 37 geomembranes, sufficient slack was included in the design to accommodate 38 thermal contraction and expansion. 39

4.5.2.4.1 Liner Repairs During Operations. Should repair of a basin 40 41 liner be required while the basin is in operation, the basin contents will be 42 transferred to the ETF or another available basin. After the liner around the 43 leaking section is cleaned, repairs to the geomembrane will be made by the 44 application of a piece of high-density polyethylene sheeting, sufficient in size to extend approximately 8 to 15 centimeters beyond the damaged area, or 45 as recommended by the vendor. A round or oval patch will be installed using 46 the same type of equipment and criteria used for the initial field 47 48 installations.

4.5.2.4.2 Control of Air Emissions. The floating covers limit 50 evaporation of aqueous waste and releases of volatile organic compounds into the atmosphere. To accommodate volumetric changes in the air between the

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1 fluid in the basin and the cover, and to avoid problems related to 'sealing' 2 the basins too tightly, each basin is equipped with a carbon filter breather 3 vent system. Any air escaping from the basins must pass through this vent, 4 consisting of a pipe that penetrates the anchor wall and extends into a carbon 5 adsorption filter unit.

7 4.5.2.5 Liner Coverage [650(2)(a)(i)(C)]. The liner system covers all of the
8 ground surface that underlies the retention basins. The primary liner extends
9 up the sideslopes to a concrete anchor wall at the top of the dike encircling
10 the entire basin (Figure 4-15).

13 4.5.3 Prevention of Overtopping [806(4)(d)(ii)(B)] 14

15 Overtopping prevention is accomplished through administrative controls 16 and liquid-level instrumentation installed in each basin. The instrumentation 17 includes local liquid-level indication as well as remote indication at the 18 ETF. Before an aqueous waste is transferred into a basin, administrative 19 controls are implemented to ensure overtopping will not occur during the 20 transfer. The volume of feed to be transferred is compared to the available 21 volume in the receiving basin. The transfer is not initiated unless there is 22 sufficient volume available in the receiving basin or a cut-off level is 23 established. The transfer into the basin would be stopped when this cut-off 24 level is reached. 25

In the event of a 100-year, 24-hour storm event, precipitation would 26 27 accumulate on the basin covers. Through the self-tensioning design of the 28 basin covers and maintenance of adequate freeboard, all accumulated 29 precipitation would be contained on the covers and none would flow over the dikes or anchor walls. The 100-year, 24-hour storm is expected to deliver 30 31 5.3 centimeters of rain or approximately 61 centimeters of snow. Cover specifications include the requirement that the covers be able to withstand 32 33 the load from this amount of precipitation. Because the cover floats on the 34 surface of the fluid in the basin, the fluid itself provides the primary 35 support for the weight of the accumulated precipitation. Through the cover 36 self-tensioning mechanism, there is ample 'give' to accommodate the overlying 37 load without overstressing the anchor and attachment points. 38

Rain water and snow evaporate readily from the cover, particularly in the arid Hanford Facility climate, where evaporation rates exceed precipitation rates for most months of the year. The black color of the cover further enhances evaporation. Thus, the floating cover prevents the intrusion of precipitation into the basin and provides for evaporation of accumulated rain or snow.

46 4.5.3.1 Freeboard. Under current operating conditions, 1.3 meters of
 47 freeboard is maintained at each LERF basin, which corresponds to an operating
 48 level of 6.1 meters, or 24.6 million liters.
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50 4.5.3.2 Immediate Flow Shutoff. The mechanism for transferring aqueous waste 51 is either through pump transfers with on/off switches or through gravity 52 transfers with isolation valves. These methods provide positive ability to

shut off transfers immediately in the event of overtopping. Overtopping a basin during a transfer is very unlikely because the low flow rates into the basin provides long response times. At a flow rate of 284 liters per minute, approximately 22 days would be required to fill a LERF basin from the 6.1 meter operating level (i.e., 1.3 meters of freeboard) to maximum capacity of 33 million liters (i.e., the 7.4-meter level).

8 4.5.3.3 Outflow Destination. Aqueous waste in the LERF is transferred 9 routinely to ETF for treatment. However, should it be necessary to 10 immediately empty a basin, the aqueous waste either would be transferred to 11 the ETF for treatment or transferred to another basin (or basins), whichever 12 is faster. If the waste is transferred to another LERF basin, the single pump 13 for normal operation can be removed, and four submersible pumps can be 14 installed using an emergency pump manifold. This portable piping and pumping 15 system is capable of pumping 2,700 liters per minute. Not including set-up 16 time, it would take approximately 7 days to pump the contents of a full basin 17 at this pumping rate. 18

4.5.4 Structural Integrity of Dikes [806(4)(d)(ii)(C)]

Written certification attesting to the structural integrity of the dikes, signed by a qualified, registered professional engineer, is included in Appendix 4D.

4.5.4.1 Dike Design, Construction, and Maintenance [650(2)(f), (g), and (h)]. The dikes of the LERF are constructed of onsite native soils, generally consisting of cobbles and gravels. Well-graded mixtures were specified, with cobbles up to 15 centimeters in the largest dimension, but not constituting more than 20 percent of the volume of the fill. The dikes are designed with a 3:1 (3 units horizontal to 1 unit vertical) slope on the basin side, and 2.25:1 on the exterior side. The dikes are approximately 8.2 meters high from the bottom of the basin, and 3 meters abovegrade.

Calculations were performed to verify the structural integrity of the dikes (HNF 1997). The calculations demonstrate that the structural strength of the dikes is such that, without dependence on any lining system, the sides of the basins can withstand the pressure exerted by the maximum quantity of fluid in the impoundment. The dikes have a factor of safety greater than 3 against failure by sliding.

42 4.5.4.2 Dike Stability and Protection. In the following paragraphs, various
 43 aspects of stability for the LERF dikes and the concrete anchor wall are
 44 presented, including slope failure, hydrostatic pressure, and protection from
 45 the environment.
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47 Failure in Dike/Impoundment Cut Slopes. A slope stability analysis was 48 performed to determine the factor of safety against slope failure. The 49 computer program 'PCSTABL5' from Purdue University, using the modified Janbu 50 Method, was employed to evaluate slope stability under both static and seismic 51 loading cases. One hundred surfaces per run were generated and analyzed. The 52 assumptions used were as follows (Chen-Northern 1991b):

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- Weight of gravel: 2,160 kilograms per cubic meter
- Maximum dry density of gravel: 2,315 kilograms per cubic meter
- Mohr-Coulomb shear strength angle for gravel: minimum 33 degrees
- Weight of soil/bentonite: 1,600 kilograms per cubic meter
- Mohr-Coulomb shear strength angle for soil/bentonite: minimum 30 degrees
- Slope: 3 horizontal:1 vertical
- No fluid in impoundment (worst case for stability)
- Soils at in-place moisture (not saturated conditions).

18 Results of the static stability analysis showed that the dike slopes were 19 stable with a minimum factor of safety of 1.77 (Chen-Northern 1991b). 20

21 The standard horizontal acceleration required in the Hanford Plant 22 Standards, "Standard Architectural-Civil Design Criteria, Design Loads for Facilities" (DOE-RL 1988), for structures on the Hanford Site is 0.12 g. 23 Adequate factors of safety for cut slopes in units of this type generally are 24 25 considered to be 1.5 for static conditions and 1.1 for dynamic stability 26 (Golder 1989). Results of the stability analysis showed that the LERF basin 27 slopes were stable under horizontal accelerations of 0.10 and 0.15 g, with 28 minimum factors of safety of 1.32 and 1.17, respectively (Chen-Northern 1991b). Printouts from the PCSTABL5 program are provided in 29 Calculations for Liquid Effluent Retention Facility Part B Permit Application 30 31 (HNF 1997).

33 **Hydrostatic Pressure.** Failure of the dikes due to buildup of hydrostatic 34 pressure, caused by failure of the leachate system or liners, is very 35 unlikely. The liner system is constructed with two essentially impermeable layers consisting of a synthetic layer overlying a soil layer with very 36 37 low-hydraulic conductivity. It would require a catastrophic failure of both liners to cause hydrostatic pressures that could endanger dike integrity. 38 39 Routine inspections of the leachate detection system, indicating quantities of 40 leachate removed from the basins, provide an early warning of leakage or 41 operational problems that could lead to excessive hydrostatic pressure. A 42 significant precipitation event (e.g., a 100-year, 24-hour storm) will not 43 create a hydrostatic problem because the interior sidewalls of the basins are 44 covered completely by the liners. The covers can accommodate this volume of precipitation without overtopping the dike (Section 4.5.3), and the coarse 45 46 nature of the dike and foundation materials on the exterior walls provides for 47 rapid drainage of precipitation away from the basins. 48

49 Protection from Root Systems. Risk to structural integrity of the dikes 50 as a result of penetrating root systems is minimal. Excavation and 51 construction removed all vegetation on and around the impoundments, and native 52 plants (such as sagebrush) grow very slowly. The large grain size of the

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cobbles and gravel used as dike construction material do not provide an advantageous germination medium for native plants. Should plants with extending roots become apparent on the dike walls, the plants will be controlled with appropriate herbicide application.

Protection from Burrowing Mammals. The cobble size materials that make up the dike construction material and the exposed nature of the dike sidewalls do not offer an advantageous habitat for burrowing mammals. Lack of 8 9 vegetation on the LERF site discourages foraging. The risk to structural integrity of the dikes from burrowing mammals is therefore minimal. Periodic 10 visual inspections of the dikes provide observations of any animals present. Should burrowing mammals be noted onsite, appropriate pest control methods 13 such as trapping or application of rodenticides will be employed. 14

15 **Protective Cover.** Approximately 7.6 centimeters of crushed gravel serve as the cover of the exterior dike walls. This coarse material is inherently 16 17 resistant to the effect of wind because of its large grain size. Total annual precipitation is low (16 centimeters) and a significant storm event (e.g., a 18 100-year. 24-hour storm) could result in about 5.3 centimeters of 19 precipitation in a 24-hour period. The absorbent capacity of the soil exceeds this precipitation rate; therefore, the impact of wind and precipitation 20 21 22 run-on to the exterior dike walls will be minimal. 23

4.5.5 Piping Systems

Aqueous waste from the 242-A Evaporator is transferred to the LERF using a pump located in the 242-A Evaporator and approximately 1.500 meters of pipe. consisting of a 3-inch carrier pipe within a 6-inch outer containment pipeline. Flow through the pump is controlled through a valve at flow rates from 150 to 300 liters per minute.

33 -The pipeline exits the 242-A Evaporator belowgrade and remains belowgrade 34 at a minimum 1.2-meter depth for freeze protection, until the pipeline emerges 35 at the LERF catch basin, at the corner of each basin. All piping at the catch 36 basin that is less than 1.2 meters belowgrade is wrapped with electric heat 37 tracing tape and insulated for protection from freezing. 38

39 The transfer line from the 242-A Evaporator is centrifugally cast. 40 fiberglass-reinforced epoxy thermoset resin pressure pipe fabricated to meet the requirements of ASME D2997 (ASME 1984). The 3-inch carrier piping is 41 42 centered and supported within 6-inch containment piping. Pipe supports are fabricated of the same material as the pipe, and meet the strength 43 44 requirements of ANSI B31.3 (ANSI 1987) for dead weight, thermal, and seismic 45 loads. 46

47 A catch basin is provided at the northwest corner of each basin where 48 piping extend from the basin to allow for basin-to-basin and basin-to-ETF liquid transfers. Drawings H-2-88766, sheets I through 4, in Appendix 4A, 49 50 provide schematic diagrams of the piping system at LERF. Drawing H-2-79604. Appendix 4A, provides details of the piping from the 242-A Evaporator to LERF. 51 52

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4.5.5.1 Secondary Containment System for Piping. The 6-inch containment 1 piping encases the 3-inch carrier pipe from the 242-A Evaporator to the LERF. 2 All of the piping and fittings that are not directly over a catch basin or a 3 4 basin liner are of this pipe-within-a-pipe construction. A catch basin is 5 provided at the northwest corner of each basin where the inlet pipes, leachate risers, and transfer pipe risers emerge from the basin. The catch basin 6 consists of a 20-centimeter-thick concrete pad at the top of the dike. The 7 perimeter of the catch basin has a 20-centimeter-high curb, and the concrete 8 9 is coated with a chemical resistant epoxy sealant. The concrete pad is sloped so that any leaks or spills from the piping or pipe connections will drain 10 11 into the basin. The catch basin provides an access point for inspecting, servicing, and operating various systems such as transfer valving, leachate 12 13 level instrumentation and leachate pump. Drawing H-2-79593 (Appendix 4A) 14 provides a schematic diagram of the catch basins. 15

16 4.5.5.2 Leak Detection System. Single-point electronic leak detection elements are installed along the transfer line at 305-meter intervals. The 17 leak detection elements are located in the bottom of specially designed test 18 risers. Each sensor element employs a conductivity sensor, which is connected 19 20 to a cable leading back to the 242-A Evaporator control room. If a leak develops in the carrier pipe, fluid will travel down the exterior surface of 21 the carrier pipe or the interior of the containment pipe. As moisture 22 contacts a sensor unit, the alarm sounds in the 242-A Evaporator control room 23 24 and the zone of the leak is indicated on the digital display. The pump located in the 242-A Evaporator is shut down, stopping the flow of aqueous 25 26 waste through the transfer line. 27

The catch basins have conductivity leak detectors that alarm in the 29 242-A Evaporator control room. Leaks into the catch basins drain back to the 30 basin through a 5.1-centimeter drain on the floor of the catch basin. 31

32 4.5.5.3 Certification. Although an integrity assessment is not required for 33 piping associated with surface impoundments, an assessment of the transfer liner was performed, including a hydrostatic leak/pressure test at 34 10.5 kilograms per square centimeter gauge. A statement by an independent, 35 qualified, registered professional engineer attesting to the integrity of the 36 piping system is included in Integrity Assessment Report for the 37 242-A Evaporator/LERF Waste Transfer Piping, Project W105 (WHC 1993), along 38 39 with the results of the leak/pressure test.

42 4.5.6 Double Liner and Leak Detection, Collection, and Removal System 43 [806(4)(d)(ii)(D) and 650(2)(j)(iii)]

The double-liner system for LERF is discussed in Section 4.5.2. The
Ieachate detection, collection, and removal system (Figures 4-17 and 4-18) was
designed and constructed to remove leachate that might permeate the primary
liner. System components for each basin include:

 30.5-centimeter layer of drainage gravel below the primary liner at the bottom of the basin

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- Geonet below the primary liner on the sidewalls to direct leachate to the gravel layer
- 3.0-meter by 1.8-meter by 0.30-meter-deep leachate collection sump consisting of a 25 millimeter high-density polyethylene flat stock. geotextile to trap large particles in the leachate, and 1.5-millimeter high-density polyethylene rub sheet set on the secondary liner
- 10-inch and 4-inch perforated leachate high-density polyethylene riser pipes from the leachate collection sump to the catch basin northwest of the basin
- Leachate collection sump level instrumentation installed in the 4-inch riser
- Level sensors, submersible leachate pump, and 1.5-inch . fiberglass-reinforced epoxy thermoset resin pressure piping installed in the 10-inch riser
- Piping at the catch basin to route the leachate through 1.5-inch high-density polyethylene pipe back to the basins.

The bottom of the basins have a 2 percent slope to allow gravity flow of leachate to the leachate collection sump. This exceeds the minimum of 1 percent slope required by WAC 173-303-650(j) for new surface impoundments. Material specifications for the leachate collection system are given in Section 4.5.2.1.1.

29 Calculations demonstrate that fluid from a small hole (2 millimeter) 30 (EPA 1989, p. 122) at the furthest end of the basin, under a low head situation, would travel to the sump in less than 24 hours (HNF 1997). Additional calculations in indicate the capacity of the pump to remove leachate is sufficient to allow time to readily identify a leak and activate 34 emergency procedures (HNF 1997). 35

36 Automated controls maintain the fluid level in each leachate sump below 37 33 centimeters to prevent significant liquid backup into the drainage layer. 38 The leachate pump is activated when the liquid level in the sump reaches about 39 28 centimeters, and is shut off when the sump liquid level reaches about 40 18 centimeters. This operation prevents the leachate pump from cycling with 41 no fluid, which could damage the pump. Liquid level control is accomplished with conductivity probes that trigger relays selected specifically for 42 43 application to submersible pumps and leachate fluids. A flowmeter/totalizer 44 on the leachate return pipe measures fluid volumes pumped and pumping rate from the leachate collection sumps, and indicates volume and flow rate on 45 local readouts. Other instrumentation provided is real-time continuous level 46 monitoring with a readout at the catch basin and the 242-A Evaporator control 47 48 room. A sampling port is provided in the leachate piping system at the catch 49 basin. Leak detection is provided through inspections of the leachate flow 50 totalizer readings. For more information on inspections, refer to 51 Chapter 6.0. 52

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The stainless steel leachate pump is designed to deliver 110 liters per minute. The leachate pump returns draws liquid from the sump via 1.5-inch pipe and discharges into the basin through 1.5-inch high-density polyethylene pipe.

4.5.7 Construction Quality Assurance [806(4)(d)(ii)(F)]

9 The construction quality assurance plan and complete report of 10 construction quality assurance inspection and testing results are provided in 11 242-A Evaporator Interim Retention Basin Construction Quality Assurance Plan 12 (KEH 1991). A general description of construction quality assurance 13 procedures is outlined in the following paragraphs.

15 For excavation of the basins and construction of the dikes, regular inspections were conducted to ensure compliance with procedures and drawings, and compaction tests were performed on the dike soils.

19 For the soil/bentonite layer, test fills were first conducted in 20 accordance with EPA guidance to demonstrate compaction procedures and to 21 confirm compaction and permeability requirements can be met. The ratio of · 22 bentonite to soil and moisture content was monitored; lifts did not exceed 23 15 centimeters before compaction, and specific compaction procedures were 24 followed. Laboratory and field tests of soil properties were performed for 25 each lift and for the completed test fill. The same suite of tests was 26 conducted for each lift during the laying of the soil/bentonite admixture in 27 the basins. 28

29 Geotextiles and geomembranes were laid in accordance with detailed 30 procedures and quality assurance programs provided by the manufacturers and 31 installers. These included destructive and nondestructive tests on the 32 geomembrane seams, and documentation of field test results and repairs. 33

35 4.5.8 Proposed Action Leakage Rate and Response Action Plan 36 [806(4)(d)(ii)(G)] 37

38 An action leakage rate limit is established where action must be taken due to excessive leakage from the primary liner. The action leak rate is based on the maximum design flow rate the leak detection system can remove 39 40 41 without the fluid head on the bottom liner exceeding 30 centimeters. The 42 limiting factor in the leachate removal rate is the hydraulic conductivity of 43 the drainage gravel. An action leakage rate (also called the rapid or large 44 leak rate) of 20,000 liters per hectare per day was calculated for each basin 45 (WHC 1992b). 46

47 When it is determined that the action leakage rate has been exceeded, the 48 response action plan will follow the actions in WAC 173-303-650(11)(b) and 49 (c), which includes notification of Ecology in writing within 7 days, 50 assessing possible causes of the leak, and determining whether waste receipt 51 should be curtailed and/or the basin emptied. 52

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4.5.9 Dike Structural Integrity Engineering Certification [806(4)(d)(v)]

Written certification attesting to the structural integrity of the dikes, signed by a qualified, registered professional engineer, is included in Appendix 4D.

4.5.10 Management of Ignitible, Reactive, or Incompatible Wastes [806(4)(d)(viii and ix)]

Although ignitible or reactive aqueous waste might be received in small quantities at LERF, such aqueous waste is with dilute solutions in the basins, removing the ignitable or reactive characteristics. For compatibility requirements with the LERF liner, refer to the waste analysis plan (Appendix 3A).

4.6 AIR EMISSIONS CONTROL [D-8 and D-8a]

This section addresses the ETF requirements of Air Emission Standards for Process Vents, under 40 CFR 264, Subpart AA (incorporated by reference in WAC 173-303-690) and Subpart CC. The requirements of 40 CFR 264, Subpart BB (WAC 173-303-691) are not applicable because aqueous waste with 10 percent or greater organic concentration would not be acceptable for processing at the ETF.

4.6.1 Applicability of Subpart AA Standards [D-8a(1)]

30 The ETF evaporator and thin film dryer perform operations that 31 specifically require evaluation for applicability of WAC 173-303-690. Aqueous 32 waste in these units routinely contains greater than 10 parts per million concentrations of organic compounds and are, therefore, subject to air 33 emission requirements under WAC 173-303-690. Organic emissions from all 34 35 affected process vents on the Hanford Facility must be less than 1.4 kilograms 36 per hour and 2.8 megagrams per year, or control devices must be installed to reduce organic emissions by 95 percent. 37

39 The vessel offgas system provides a process vent system. This system provides a slight vacuum on the ETF process vessels and tanks (refer to 40 41 Section 4.2.5.2). Two vessel vent header pipes combine and enter the vessel 42 offgas system filter unit consisting of a demister, electric heater, 43 prefilter, high-efficiency particulate air filters, activated carbon adsorber, 44 and two exhaust fans (one fan in service while the other is backup). The 45 vessel offgas system filter unit is located in the high-efficiency particulate air filter room west of the process area. The vessel offgas system exhaust 46 discharges into the larger building ventilation system, with the exhaust fans 47 and stack located outside and immediately west of the ETF. The exhaust stack 48 discharge point is 15.5 meters above ground level. 49

The annual average flow rate for the ETF stack (which is the combined vessel offgas and building exhaust flow rates) is provided in *Radionuclide Air*

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Emissions Report for the Hanford Site - Calendar Year 1995 (DOE-RL 1996) as
 220 cubic meters per minute with a total annual flow of approximately
 1.2 E+08 cubic meters. During waste processing, the airflow through just the
 vessel offgas system is about 23 standard cubic meters per minute.

Organic emissions occur during waste processing, which occurs less than
310 days each year (i.e., 85 percent operating efficiency). This operating
efficiency represents the maximum annual operating time for the ETF, as
shutdowns are required during the year for planned maintenance outages and for
reconfiguring the ETF to accommodate different aqueous waste.

13 4.6.2 Process Vents - Demonstrating Compliance [D-8a(2)]

This section outlines how the ETF complies with the requirements and includes a discussion of the basis for meeting the organic emissions limits, calculations demonstrating compliance, and conditions for re-evaluation.

19 4.6.2.1 Basis for Meeting Limits/Reductions [D-8a(2)(a)]. The 20 242-A Evaporator and the 200 Area ETF are currently the only operating TSD 21 units that contribute to the Hanford Facility volatile organic emissions under 22 40 CFR 264. Subpart AA. The combined release rate is currently well below the 23 threshold of 1.4 kilograms per hour or 2,800 kilograms per year of volatile organic compounds [General Information Portion (DOE/RL-91-28)]. As a result. 24 25 the ETF meets these standards without the use of air pollution control 26 devices. 27

The amount of organic emissions could change as waste streams are changed, or TSD units are brought online or are deactivated. The organic air emissions summation will be re-evaluated periodically as condition warrants. Operations of the TSD units operating under 40 CFR 264, Subpart AA, will be controlled to maintain Hanford Facility emissions below the threshold limits or pollution control device(s) will be adedd, as necessary, to achieve the reduction standards specified under 40 CFR 264, Subpart AA.

36 4.6.2.2 Demonstrating Compliance [D-8a(2)(b)]. Calculations to determine 37 organic emissions are performed using the following assumptions: 38

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- Maximum flow rate from LERF to ETF is 568 liters per minute.
- Emissions of organics from tanks and vessels upstream of the UV/OX process are determined from flow and transfer rates given in *Clean Air Act Requirements, WAC 173-400, As-built Documentation, Project C-018H, 242-A Evaporator/PUREX Plant Process Condensate Treatment Facility* (Adtechs 1995).
- UV/OX reaction rate constants and residence times are used to determine the amount of organics which are destroyed in the UV/OX process. These constants are given in 200 Area Effluent Treatment Facility Delisting Petition (DOE/RL 1992).
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- All organic compounds that are not destroyed in the UV/OX process are assumed to be emitted from the tanks and vessels into the vessel offgas system.
- No credit for removal of organic compounds in the vessel offgas system carbon adsorber unit is taken.

The calculation to determine organic emissions consists of the following steps:

- 1. Determine the quantity of organics emitted from the tanks or vessels upstream of the UV/OX process, using transfer rate values
- Determine the concentration of organics in the waste after the UV/OX process using UV/OX reaction rates and residence times. If the ETF is configured such that the UV/OX process is not used, a residence time of zero is used in the calculations (i.e., none of the organics are destroyed)
- Assuming all the remaining organics are emitted, determine the rate which the organics are emitted using the feed flow rate and the concentrations of organics after the UV/OX process
- 4. The amount of organics emitted from the vessel offgas system is the sum of the amount calculated in steps 1 and 3.

The organic emission rates and quantity of organics emitted during processing are determined using these calculations and are included in the ETF operating record. The Hanford Facility has a system to ensure organic. emissions from units subject to 40 CFR 264, Subpart AA are less than the limits of 1.4 kilograms per hour and 2.8 megagrams per year. Records documenting total organic emissions are available for Ecology review on request.

35 4.6.2.3 Reevaluating Compliance with Subpart AA Standards [D-8a(2)(d)]. 36 Calculations to determine compliance with Subpart AA will be reviewed when any 37 of the following conditions occur at the ETF: 38

- Changes in the maximum feed rate to the ETF (i.e., greater than the 568 liters per minute flow rate)
- Changes in the configuration or operation of the ETF that would modify the assumptions given in Section 4.6.2.2 (e.g., taking credit for the carbon adsorbers as a control device)
- Annual operating time exceeds 310 days.

4.6.3 Applicability of Subpart CC Standards [D-8c]

The air emission standards of 40 CFR 264, Subpart CC apply to tank, surface impoundment, and container storage units that manage wastes with

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1 average volatile organic concentrations equal to or exceeding 500 parts per 2 million by weight, based on the hazardous waste composition at the point of 3 origination (61 FR 59972). However, TSD units that are used solely for 4 management of mixed waste are exempt. Mixed waste is managed at the ETF and 5 LERF and dangerous waste also could be treated and stored at these TSD units. 6

TSD owner/operators are not required to determine the concentration of volatile organic compounds in a hazardous waste if the wastes are placed in waste management units that employ air emission controls that are in compliance with the Subpart CC standards. Therefore, the approach to Subpart CC compliance at the ETF and LERF is to demonstrate that the ETF and LERF meet the Subpart CC control standards (40 CFR 264.1084 - 264.1086).

14 4.6.3.1 Demonstrating Compliance with Subpart CC for Tanks. Since the ETF 15 tanks already have process vents regulated under 40 CFR 264, Subpart AA 16 (WAC 173-303-690), they are exempt from Subpart CC [40 CFR 264.1080(b)(8)]. 17

18 4.6.3.2 Demonstrating Compliance with Subpart CC for Containers. Container 19 Level 1 and Level 2 standards are met at the ETF by managing all dangerous 20 and/or mixed wastes in U.S. Department of Transportation containers 21 [40 CFR 264.1086(f)]. Level 1 containers are those that store more than 22 0.1 cubic meters and less than or equal to 0.46 cubic meters. Level 2 23 containers are used to store more than 0.46 cubic meters of waste which are in 24 "light material service". Light material service is defined where a waste in 25 the container has one or more organic constituents with a vapor pressure greater than 0.3 kilopascals at 20°C, and the total concentration of such 26 27 constituents is greater than or equal to 20 percent by weight. 28

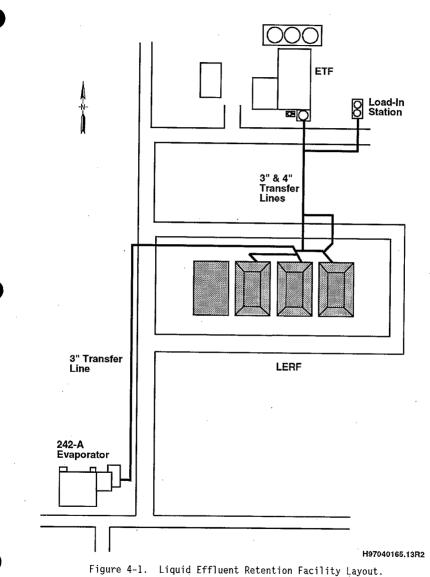
The monitoring requirements for Level 1 and Level 2 containers include a visual inspection when the container is received at the ETF and when the waste is initially placed in the container. Additionally, at least once every 22 12 months when stored onsite for 1 year or more, these containers must be inspected.

35 If compliant containers are not used at the ETF, alternate container 36 management practices are used that comply with the Level 1 standards. 37 Specifically, the Level 1 standards allow for a "container equipped with a 38 cover and closure devices that form a continuous barrier over the container 39 openings such that when the cover and closure devices are secured in the 40 closed position there are no visible holes, gaps, or other open spaces into the interior of the container. The cover may be a separate cover installed on the container...or may be an integral part of the container structural 41 42 design...." [40 CFR 264.1086(c)(1)(ii)]. An organic-vapor-suppressing barrier, such as foam, may also be used [40 CFR 264.1086(c)(1)(iii)]. 43 44 45 Section 4.3 provides detail on container management practices at the ETF. 46

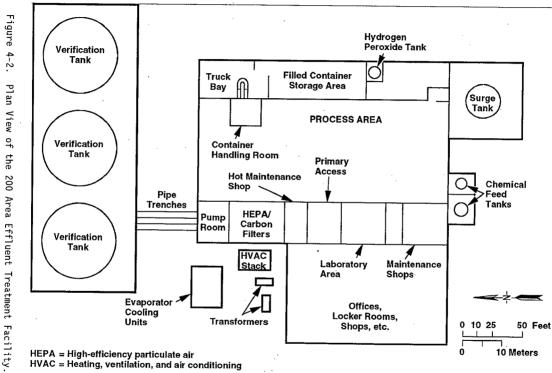
47 Container Level 3 standards apply when a container is used for the
48 "treatment of a hazardous waste by a waste stabilization process"
49 [40 CFR 264.1086(2)]. Because treatment in containers is not provided at the
50 ETF, these standards do not apply.

4.6.3.3 Demonstrating Compliance with Subpart CC for Surface Impoundments.
The Subpart CC emission standards are met at LERF through the use of a
floating membrane cover that is constructed of very-low-density polyethylene
that forms a continuous barrier over the entire surface area
[40 CFR 264.1085(c)]. This membrane has both organic permeability properties
equivalent to a high-density polyethylene cover and chemical/physical
properties that maintain the material integrity for the intended service life
of the material. The additional requirements for the floating cover at the
LERF have been met (Section 4.5.2.4).

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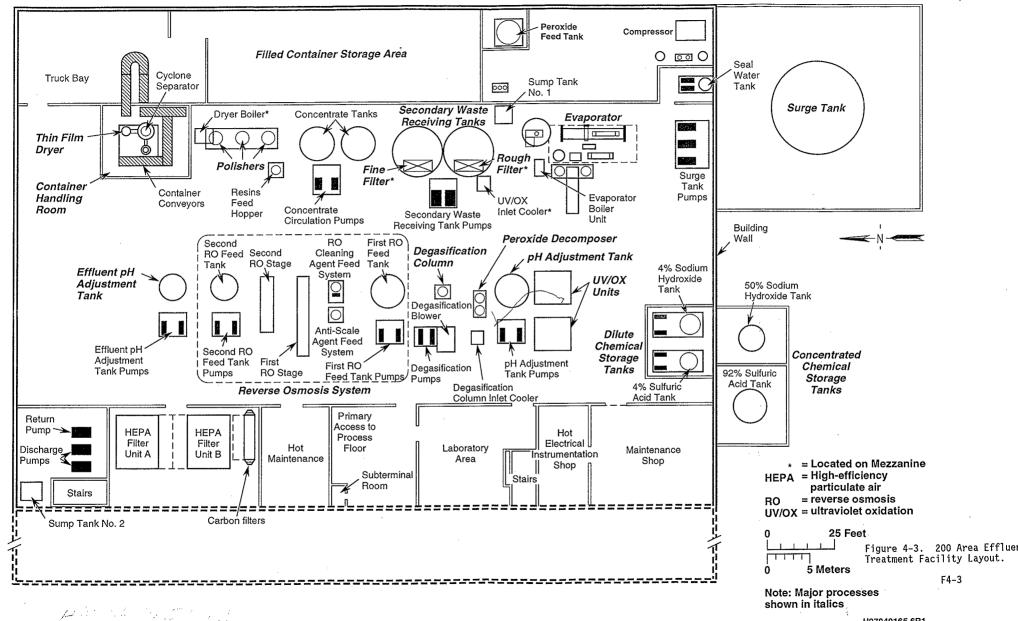
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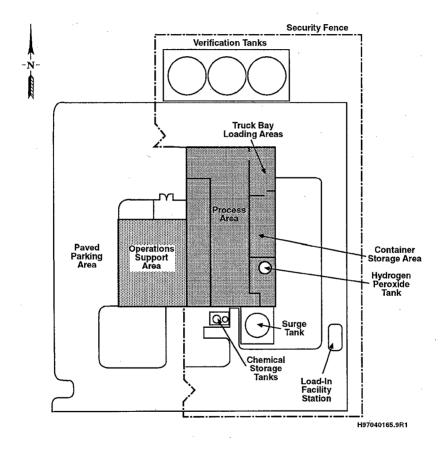
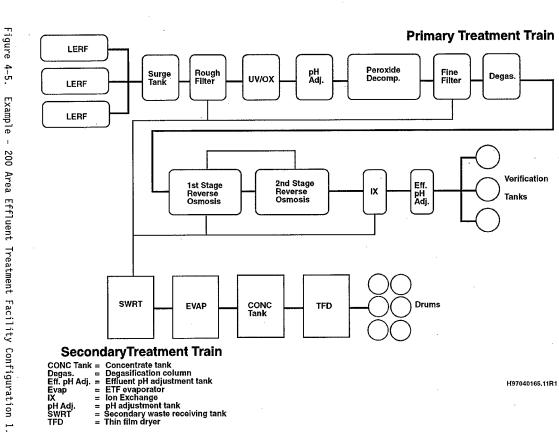


Figure 4-4. 200 Area Effluent Treatment Facility.



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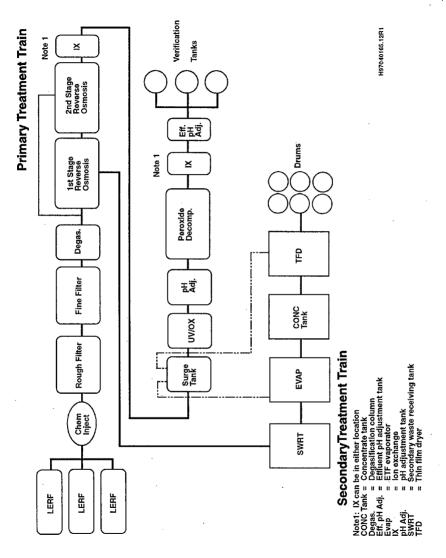


Figure 4-6. Example - 200 Area Effluent Treatment Facility Configuration 2.

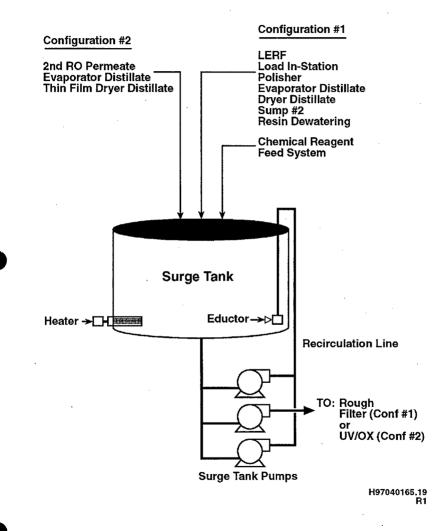
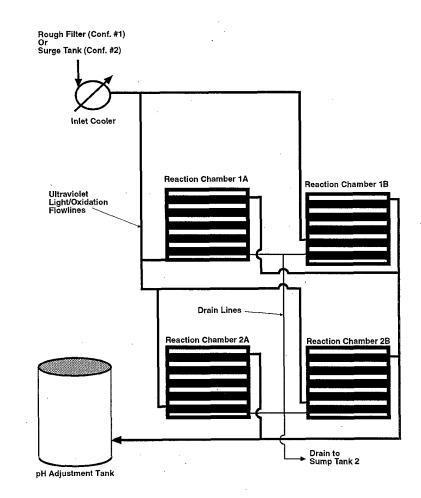
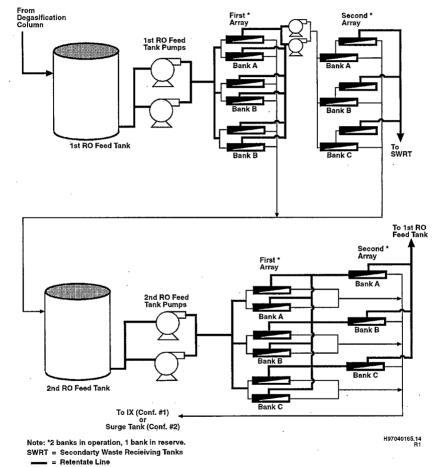


Figure 4-7. Surge Tank.



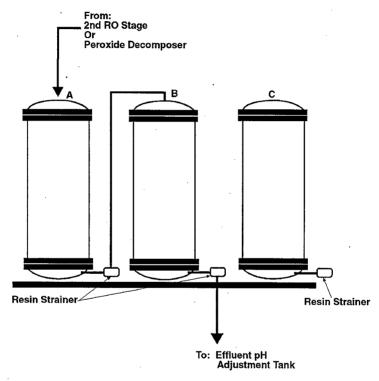
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Figure 4-8. Ultraviolet Light/Oxidation Unit.



----- = Permeate Line

Figure 4-9. Reverse Osmosis Unit.



NOTE: Example Configuration- Column A and B in Operation, Column C in Standby Mode

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Figure 4-10. Ion Exchange Unit.

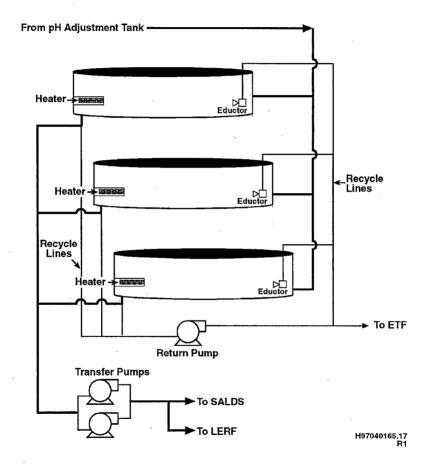


Figure 4-11. Verification Tanks.

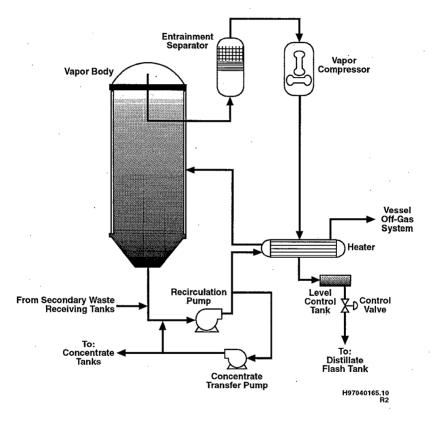


Figure 4-12. Effluent Treatment Facility Evaporator.

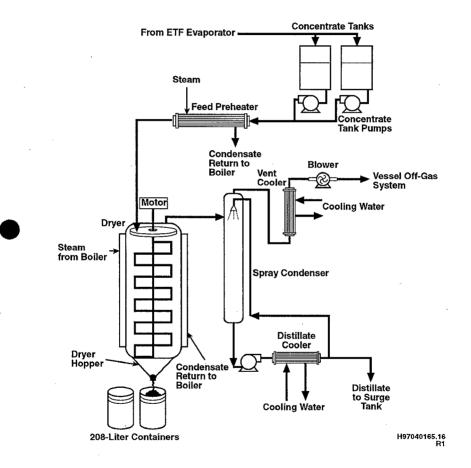


Figure 4-13. Thin Film Dryer.

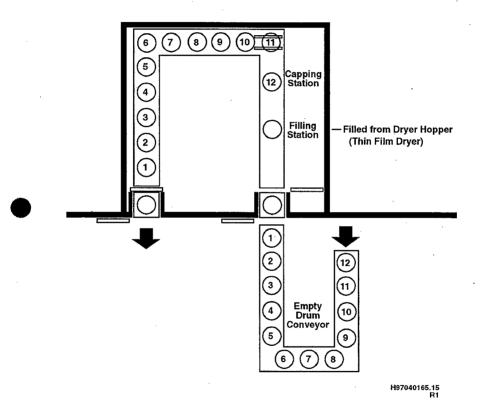


Figure 4-14. Container Handling System.

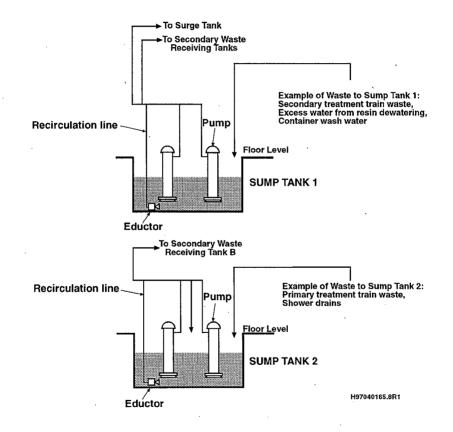
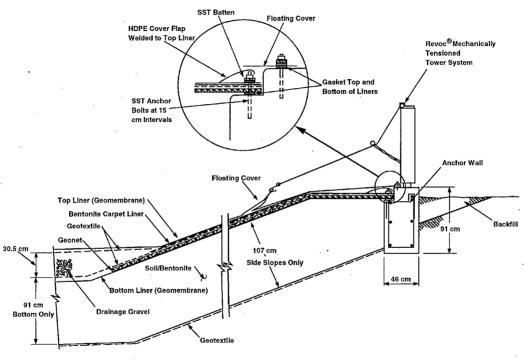
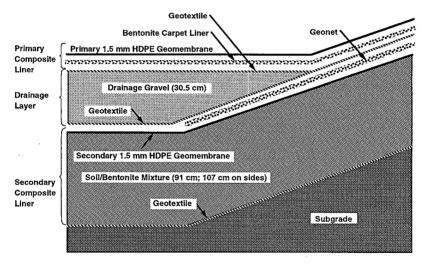


Figure 4-15. Effluent Treatment Facility Sump Tanks.



. ⊕ = Patented and licensed by CW Neal Corp, Santee, CA Not to Scale DOE/RL-97-03, Rev. 0 07/97

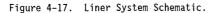
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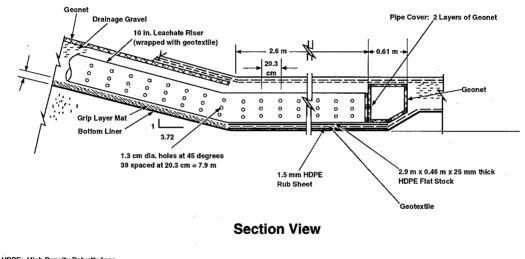


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HDPE: High Density Polyethylene

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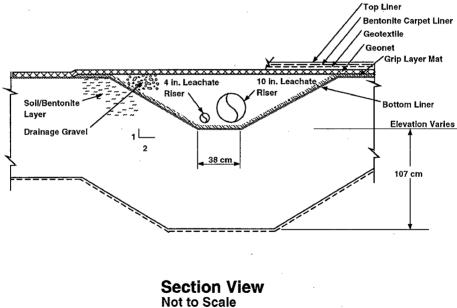
Figure 4-18.

Detail

of Leachate Collection Sump.

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Table 4-1. 200 Area Effluent Treatment Facility Tank Systems Information. (sheet 1 of 2)

Tank Description	Material of Construction	Maximum Tank Capacity' liters	Inner diameter meters	Height meters	Shell Thickness ^{2°} centimeters	Corrosion Protection ³
Load-in tanks (2)	304 SS	37,900	3.6	4.7	0.64	Type 304 SS
Surge tank	304 SS	461,820	7.9	9.2	0.48	Type 304 SS
pH adjustment tank	304 SS	16,660	3.0	2.5	0.64	Type 304 SS
First RO feed tank	304 SS	20,440	3.0	3.2	0.64	Type 304 SS
Second RO feed tank	304 SS	7,600	Nonround tank 3.0 m x 1.5 m	1.5	0.48 w/rib stiffeners	Type 304 SS
Effluent pH adjustment tank	304 SS	14,390	2.4	3.6	0.64	Type 304 SS
Verification tanks (3)	Carbon steel with epoxy lining	2,763,340	18.3	11.4	0.79	epoxy coating
Secondary waste receiving tanks (2)	304 SS	75,700	4.3	5.7	0.64	Type 304 SS
Concentrate tanks (2)	316L SS	24,980	3.0	3.8	0.64	Type 316 SS
ETF evaporator (Vapor Body)	Alloy 625	20,800	2.4	6.8	variable	Alloy 625
Distillate flash tank	304 SS	950	Horizontal tank 0.76	Length 2.2	0.7	304 SS
Sump tank 1	304 SS	4,160	1.5 x 1.5	3.4	3/16	304 SS
Sump tank 2	304 SS	4,160	1.5 x 1.5	3.4	3/16	304 SS

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Table 4-1. 200 Area Effluent Treatment Facility Tank Systems Information. (sheet 2 of 2)

456	Tank description	Liner materials	Pressure controls	Foundation materials	Structural support	Seams	Connections
7	Load-in tanks (2)	None	vent to atmosphere	concrete slab	SS skirt bolted to concrete	welded	flanged
8	Surge tank	None	pressure indicator/vacuum breaker valve	reinforced concrete ring plus concrete slab	structural steel on concrete base	welded	flanged
9	pH adjustment tank	None	pressure indicator/vent to VOG	concrete slab	carbon steel skirt	welded	flanged
10	First RO feed tank	None	pressure indicator/vent to VOG	concrete slab	carbon steel skirt	welded	flanged
11	Second RO feed tank	None	pressure indicator/vent to VOG	concrete slab	carbon steel frame	welded	flanged
12	Effluent pH adjustment tank	None	pressure indicator/vent to VOG	concrete slab	carbon steel skirt	welded	flanged
13	Verification tanks (3)	Ероху	pressure indicator/filtered vent to atmosphere	reinforced concrete ring plus concrete slab	structural steel on concrete base	welded	flanged
14	Secondary waste receiving tanks (2)	None	pressure indicator/vent to VOG	concrete slab	carbon steel skirt	welded	flanged
16	Concentrate tanks (2)	None	pressure indicator/vent to VOG	concrete slab	carbon steel skirt	welded	flanged
17	ETF evaporator (vapor body)	None	pressure indicator/vapor vent - to DFT/VOG	concrete slab	carbon steel frame	welded	flanged
18	Distillate flash tank	None	vent to VOG	concrete slab	carbon steel I-beam and cradle	welded	flanged
19	Sump tank 1	None	vent to VOG	concrete containment	reinforced concrete containment basin	welded	flanged
20	Sump tank 2	None	vent to VOG	concrete containment	reinforced concrete containment basin	welded	flanged

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¹ The maximum operating volume of the tanks is identified. For the load-in tanks and the second RO feed tank, the maximum operating volume is also the operating capacity. The nominal thickness of ETF tanks is represented. ³ Type 304 SS, 304L, 316 SS and alloy 625 provide corrosion protection. 304 SS = stainless steel type 304 or 304L. 316L SS = stainless steel type 316L. DFT = distillate flash tank. VOG = vessel offgas system.

	Table 4-2. Ancillary Equ	ipment and Material Data. (sh	eet 1 of 2)
System	Ancillary equipment	Number	Material
Load-in tanks	Load-in/transfer pumps (2)	P-103A/-103B	316 ss
Surge tank	Surge tank pumps (3)	2025E-60A-P-1A/-1B/-1C	304 SS
Rough filter	Rough filter	2025E-60B-FL-1	304 SS
UV/0X	UV oxidation inlet cooler	2025E-60B-E-1	316 SS
00702	UV oxidizers (4)	2025E-60D-UV-1A/-1B/-2A/-2B	316 SS
pH adjustment	pH adjustment pumps (2)	2025E-60C-P-1A/-1B	304 SS
Peroxide decomposer	H ₂ O ₂ decomposers (2)	2025E-60D-CO-1A/-1B	CS with epoxy coating
Fine filter .	Fine filter	2025E-60B-FL-2	304 SS
	Degasification column inlet cooler	2025E-60E-E-1	316 \$\$
Degasification	Degasification column	2025E-60E-C0-1	FRP
	Degasification pumps (2)	2025E-60E-P-1A/-1B	316 SS
	Feed/booster pumps (6)	2025E-60F-P-1A/-1B/-2A/-2B/-3A/-3B	304 SS
RO	Reverse osmosis arrays (21)	2025E-60F-RO-01 through -21	Membranes: polyamide Outer piping: 304 SS
IX/Polishers	Polishers (3)	2025E-60G-IX-1A/-1B-1C	CS with epoxy coating
tyrot miners	Resins strainers (3)	2025E-60G-S-1A/-1B/-1C	304 SS
Effluent pH adjustment	Recirculation/transfer pumps (2)	2025E-60C-P-2A/-2B	304 SS/PVC
Verification tanks	Return pump	2025E-60H-P-1	304 ss
Verification talks	Transfer pumps (2)	2025E-60H-P-2A/-2B	
Secondary waste receiving tanks	Secondary waste feed pumps (2)	2025E-60I-P-1A/-1B	304 SS

Table 4-2. Ancillary Equipment and Material Data. (sheet 1 of 2)

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System	Ancillary equipment	Number	
	Feed/distillate heat exchanger	2025E-60I-E-02	
	Heater (reboiler)	2025E-60I-E-01	
	Recirculation pump	2025E-601-P-02	
	Concentrate transfer pump	2025E-601-P-04	
ETF evaporator system	Entrainment separator	2025E-60I-DE-01	
	Vapor compressor (incl. silencers)	2025E-601-C-01	
	Silencer drain pump	2025E-601-P-06	
	Level control tank	2025E-601-TK-5	
	Distillate flash tank pump	2025E-601-P-03	
Concentrate tanks	Concentrate circulation pumps (2)	2025E-60J-P-1A/-1	

Concentrate feed pump

Drver feed preheater

Distillate condenser

Dryer distillate pump

Dewatering pump

Thin film dryer

Powder hopper Spray condenser

Table 4-2. Ancillary Equipment and Material Data. (sheet 2 of 2)

2025E-60J-P-2

2025E-60J-E-3

2025E-60J-D-1

2025E-60J-H-1

2025E-60J-DE-01

2025E-60J-CND-01

2025E-60J-P-3 2025E-80E-P-1

. . .

CS = carbon steel.

Resin dewatering

FRP = fiberglass reinforced plastic. PVC = polyvinyl chloride.

RO = reverse osmosis.

UV = ultraviolet.

304 SS = stainless steel type 304 or 304L.316 SS = stainless steel type 316 or 316L.

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12 14 Thin film dryer

Material

Tubes: 316 SS Shell: 304 SS Tubes: alloy 625 Shell: 304 SS 316 SS 316 SS Top section: 316 SS Bottom section: alloy 625 304 SS 316 \$\$ 304 SS 316 SS 316 SS

316 SS

316 SS

Interior surfaces: alloy 625

Rotor and blades: 316 SS

316 SS

316 SS Tubes: 304 SS

Shell: CS 316 SS

1 2	Table 4-3. Concrete and Masonry Coatings.						
3	Coating	Minimum wet film thickness (mil)	Percentage of film forming solids per volume (%)	Minimum dry film thickness (mil)			
4	Conc	rete and mason	ry				
5	Prime: Amercoat-187*	4.5	22.0	1.0			
6	Second: Amercoat-33	6.4	23.46	1.5			
7	Finish: Amercoat-33	6.4	23.46	1.5			
8		or					
9	Prime: Amercoat-385	5-6	66	3-4			
10	Topcoat: Amercoat-450HS	3-4	66	2-2.5			
11	High traffic, container storage area						
12	Filler: Ameron Nu-Klad 114A**		100				
13	Prime: Amercoat-105A	2-3	` 100	2-3			
14	Topcoat: Amercoat-120	20-30	100	20-30			

*Amercoat is a trademark of Ameron, Incorporation. **Nu-Klad is a trademark of Ameron, Incorporation.

Table 4-3. Concrete and Masonry Coatings.

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3 4	Property	Value					
5	Specific gravity	0.932 to 0.950					
6	Melt flow index	1.0 g/10 min., maximum					
7 8 9	Thickness (thickness of flow marks shall not exceed 200% of the nominal liner thickness)	60 mil ± 10% (1.5 mm ± 10%)					
10	Carbon black content	1.8 to 3%, bottom liner 2 to 3%, top liner					
11	Tensile properties (each direction)						
12	Tensile strength at yield	21.5 kgf/cm width, minimum					
13	Tensile strength at break	32.2 kgf/cm width, minimum					
14	Elongation at yield	10%, minimum					
15	Elongation at break	500%, minimum					
16	Tear resistance	13.6 kgf, minimum					
17	Puncture resistance	31.3 kgf, minimum					
18	Low temperature/brittleness	-40 °C, maximum					
19 20	Dimensional stability (% change each direction)	±2%, maximum					
21	Environmental stress crack	750 h, minimum					
22	Water absorption	0.1 maximum and weight change					
23	Hydrostatic resistance	316,000 kgf/m ²					
24 25	Oxidation induction time (200 °C/1 atm. O ₂)	90 min, minutes					
26							

Table 4-4. Geomembrane Material Specifications.

Reference: Construction Specifications (KEH 1990b). Format uses NSF 54 table for high-density polyethylene as a guide (NSF 1985). However, RCRA values for dimensional stability and environmental stress crack have been added.

%	= percent	max = maximum
g	= gram	[.] kgf = kilograms force
min	= minute	m = meters
h	= hour	mm = millimeters

T4-4

Property	Value		
Sieve size			
25 millimeters	100 wt% passing		
19 millimeters	80 - 100 wt% passing		
9.5 millimeters	10 - 40 wt% passing		
4.75 millimeters	0 – 4 wt% passing		
Permeability	0.1 cm/sec, minimum		

Table 4-5. Drainage Gravel Specifications.

Reference: Sieve size is from WSDOT M41-10-88, Section 9.03.1(3)C for Grading No. 5 (WSDOT 1988). Permeability requirement is from WAC 173-303-650(2)(j) for new surface impoundments.

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5.0 GROUNDWATER MONITORING [D-10]

5.1 EXEMPTION FROM GROUNDWATER PROTECTION REQUIREMENTS [D-10a]

A waiver from the groundwater monitoring requirements as allowed under WAC 173-303-645 is not requested. Therefore, the requirements of the Washington Administrate Code for groundwater monitoring are applicable to the LERF.

12 5.2 INTERIM STATUS PERIOD GROUNDWATER MONITORING DATA [D-10b]

14 Information on interim status groundwater monitoring activities is 15 provided in Interim Status Ground Water Monitoring Plan for the 200 East Area 16 Liquid Effluent Retention Facility (WHC 1991a), in Hanford Site Groundwater 17 Monitoring for Fiscal Year 1996 (PNNL 1997a), and in the Hanford Environmental 18 Information System. There have been no significant detections of the 19 indicator parameters that could be attributed to the LERF.

22 5.3 AQUIFER IDENTIFICATION [D-10c]

The characteristics of the uppermost aquifer beneath the LERF and the regional physiographic, geologic, and hydrogeologic setting of the LERF are summarized in Chapter 5.0 of the General Information Portion (DOE/RL-91-28).

29 5.4 CONTAMINANT PLUME DESCRIPTION [D-10d]

31 A description of the contaminant plumes existing beneath the 200 East 32 Area and 200 West Area is provided in Chapter 5.0 of the General Information 33 Portion (DOE/RL-91-28). 34

36 5.5 DETECTION MONITORING PROGRAM [D-10e]

Interim status groundwater monitoring will be continued until a final status groundwater monitoring plan is submitted by DOE and approved by Ecology. The approved final status groundwater monitoring plan will be implemented immediately on approval and will be submitted for incorporation as a modification to the LERF permit before the end of calendar year 1998. The ultimate goal is to develop a consolidated groundwater monitoring plan for the Hanford Site, which will supersede the LERF specific final status groundwater for incorporation to the LERF specific final status groundwater and the specific final status groundwater monitoring plan.

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6.0 PROCEDURES TO PREVENT HAZARDS [F]

This chapter discusses security; inspection schedules; preparedness and prevention requirements; preventive procedures, structures, and equipment; and prevention of reaction of ignitable, reactive, and incompatible waste at LERF and ETF.

6.1 SECURITY [F-1]

 The following sections describe the security measures, equipment, and warning signs used to control entry to LERF and ETF. Hanford Facility security measures are discussed in the General Information Portion (DOE/RL-91-28).

6.1.1 Security Procedures and Equipment [F-1a]

The following sections describe the 24-hour surveillance system, barriers, and warning signs used to provide security and to control access to LERF and ETF.

6.1.1.1 24-Hour Surveillance System. The entire Hanford Facility is a controlled-access area. For surveillance information, refer to General Information Portion (DDE/RL-91-28).

6.1.1.2 Barrier and Means to Control Entry. The LERF and ETF are protected by the 200 East Area fence. Visitors are required to be escorted. The LERF is surrounded in its entirety by a separate 2.1 meter chain link fence topped with 3 strands of barbed wire extended outward at a 45° angle (referred to as the operational security fence). Access to the LERF is gained through two locked vehicular gates off the perimeter road. Gate keys are retained at the 242-A Evaporator and ETF shift offices.

Persons desiring entry to ETF process area must notify the control room. These persons also must have the appropriate facility-specific training, as defined in the Dangerous Waste Training Plan (Appendix 8A). The ETF personnel monitor all persons entering ETF and notify the Hanford Patrol of any attempted unauthorized entry. Immediate response by protective force personnel maintains the necessary security at the LERF and ETF.

6.1.1.3 Warning Signs. Signs bearing the legend "DANGER--UNAUTHORIZED
PERSONNEL KEEP OUT," or an equivalent legend, are posted around the perimeter
of LERF and ETF. The signs are in English, legible from a distance of
7.6 meters, and are visible from all angles of approach. In addition to these
signs, the fences around the 200 East Area are posted with signs, printed in
English, warning against unauthorized entry. These signs also are visible
from all angles of approach.

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6.1.2 Waiver [F-1b]

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Waiver of the security procedures and equipment requirements for LERF and ETF are not requested. Therefore, WAC 173-303-310(1)(a) and (b) are not applicable to LERF and ETF.

6.2 INSPECTION PLAN [F-2]

This section describes the method and schedule for inspections of LERF and ETF. The purpose of inspections is to help ensure that situations do not exist that might cause or lead to the release of dangerous and/or mixed waste that could pose a threat to human health and the environment. Abnormal conditions identified by an inspection will be corrected on a schedule that prevents hazards to workers, the public, and the environment.

18 6.2.1 General Inspection Requirements [F-2a and F-2a(4)]

The content and frequency of inspections are described in this section. Inspection records are retained at the ETF, or other approved locations, for a minimum of 5 years.

In radioactive areas of the ETF, many inspections are performed remotely.
 Monitoring instruments are connected to audible alarms and visual indicators
 track alarm status. The monitoring system provides trending of selected
 monitoring data, graphics, and equipment summary displays.

A preventive maintenance recall system is employed to direct preventive maintenance activities at the LERF and the ETF. Equipment requiring maintenance is checked as indicated by the maintenance history and the manufacturer's recommendations. The preventive maintenance of certain equipment might not be possible if the LERF or the ETF is in an operational mode. Thus, the preventive maintenance could be performed slightly earlier or later than planned to minimize impact on operations.

Instrumentation at ETF is calibrated regularly to ensure accuracy and reliability. All process control instrumentation is calibrated on a schedule depending on previous calibration experience. An instrument calibration and recall system is employed to manage calibrations.

42 6.2.1.1 Types of Problems. Key components of the LERF inspection program 43 include the following areas:

- Structural integrity of the basins
 - Catch basin secondary containment system integrity
- Evidence of release from basins
- Safety, communications, and emergency equipment.
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Key components of the ETF inspection program include the following areas:

- Condition of tanks and ancillary piping
- Condition of containers

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- · Condition of the process control equipment
- Condition of emergency equipment
- Condition of secondary containment.

Tables 6-1 and 6-2 provide a description of ETF items to be inspected.

6.2.1.2 Frequency of Inspections [F-2a(3)]. The frequency of inspections is based on the rate of possible deterioration of equipment and the probability of a threat to human health or the environment.

While in operation, the LERF is inspected weekly. The LERF also is inspected for run-on, run-off, cover integrity, and erosion problems after significant precipitation events. The ETF is inspected as indicated in Tables 6-1 and 6-2.

6.2.2 Specific Process Inspection Requirements [F-2d].

The following sections describe the specific process inspections performed at LERF and ${\sf ETF}$.

6.2.2.1 Container Inspections [F-2d(1)]. Containers are used at the ETF to store solidified secondary waste, such as the powder waste from the thin film dryer and maintenance and operations waste. When containers are being held in the container storage area, the following inspection schedule is maintained:

- Daily visual inspection of container storage area for leaks, spills, accumulated liquids, and open or improperly sealed containers
- Weekly visual inspection of container labels to ensure labels are not obscured, removed, or otherwise unreadable
- Weekly visual inspection for deterioration of containers, containment systems, or cracks in protective coating or foundations caused by corrosion, mishandling, or other factors.

41 Following the inspections, an inspection datasheet is signed and dated by 42 the inspector and supervisor.

6.2.2.2 Tank Inspections [F-2d(2)]. A description of the tank systems and
ancillary equipment at the ETF is given in Chapter 4.0. Inspections and
frequencies are given in Tables 6-1 and 6-2. This section includes a brief
discussion of the inspections.

6.2.2.2.1 Overfill Protection. Tanks that have the possibility of being
 overfilled have level instrumentation that alarms before the tanks reach
 overflow. High tank level alarms annunciate in the control room, allowing
 operating personnel to take immediate action to stop the vessels from

1 overfilling. These alarms are monitored continuously in the control room 2 during solution transfers. 3

4 6.2.2.2.2 Visual Inspections. Visual inspections of tanks and secondary containments are performed to check for leaks, signs of corrosion or damage, and malfunctioning equipment. Inspections are performed on tanks and the 7 secondary containment within the ETF and the surge tank and verification tank 8 and associated secondary containment. 9

6.2.2.2.3 Secondary Containment Leak Detectors. The surge tank and 10 11 verification tank secondary containment systems have sloped floors that drain 12 solution to sumps equipped with leak detectors that alarms in the control 13 room. These alarms are inspected daily. If an alarm is activated, further 14 investigation is performed to determine if the source is a tank leak or other 15 solution (i.e., precipitation). 16

17 6.2.2.2.4 Integrity Assessments. The initial integrity assessment was 18 issued in 1995 (Chapter 4.0). A program has been implemented to perform 19 . integrity inspections every 5 years beginning in 2000. Tanks believed to have the greatest potential for corrosion are inspected more frequently. 20 21

22 6.2.2.2.5 Effluent Treatment Facility Piping. The ETF employs an 23 extensive piping system. During inspections at the ETF, any aboveground 24 piping is inspected visually for signs of leakage and for general structural 25 integrity. During the visual inspection, particular attention is paid to 26 valves and fittings for signs of cracking, deformation, and leakage. 27

28 6.2.2.3 Surface Impoundments [F-2d(6)] and Condition Assessment [F-2d(6)(a)]. 29 The following describes the surface impoundment inspections performed at LERF. 30

31 6.2.2.3.1 Overtopping Control [F-2d(6)(a)(1)]. Under current operating 32 conditions, 1.34 meters of freeboard is maintained at each LERF basin, which corresponds to a normal operating level of 6.1 meters, or 24.6 million liters. 33 Level indicators at each basin are monitored to confirm that this level is not 34 35 exceeded. 36

37 Before an aqueous waste is transferred into a basin, administrative controls are implemented to ensure overtopping will not occur during the 38 39 transfer. The volume of feed to be transferred is compared to the available 40 volume in the receiving basin. The transfer is not initiated unless there is 41 sufficient volume available in the receiving basin or a cut-off level is 42 established. The transfer into the basin would be stopped when this cut-off 43 level is reached. 44

45. The LERF basins also are provided with floating very low-density 46 polyethylene covers that are designed and constructed to prevent overtopping 47 by the introduction of precipitation and dust into the basins. Overtopping 48 and flow control also are discussed in Chapter 4.0. 49

50 6.2.2.3.2 Impoundment Contents [F-2d(6)(a)(2)]. The LERF basins are 51 inspected weekly to assess whether the contents are escaping from a basin.

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Level indicators are inspected weekly to check for unaccountable change in the level of the basins.

6.2.2.3.3 Leak Detection [F-2d(6)(a)(3)]. The leachate detection, collection and removal system is described in Chapter 4.0. The leachate collection sump pump is activated automatically when the liquid level in the leachate sump reaches a preset level. A flowmeter and totalizer measure the amount of leachate removed. An inspection is performed weekly where the totalizer reading and basin level reading are used to determine the leak rate per wetted surface area. The leak rate is compared to previous rates to see if leakage has increased.

13 The LERF employs a double-walled transfer piping between 242-A Evaporator and LERF and between LERF and ETF. The WAC 173-303-650 regulations do not 14 15 require a discussion of piping for surface impoundments. However, for the purposes of comprehensive coverage of the LERF, inspections and integrity 16 17 assessments are performed on the piping system. Aqueous waste (e.g., process 18 condensate) is transferred from the 242-A Evaporator to the LERF via a buried pipeline. Likewise, aqueous waste is transferred to the ETF via buried 19 20 pipelines. At the LERF dikes, aboveground piping serves to transfer waste 21 from one basin to another. 22

The buried pipelines are 'inspected' continuously during transfers by a leak detection system (Chapter 4.0). The alarms on the leak detection system are monitored in the 242-A Evaporator and ETF control rooms. The transfer lines from the LERF to the ETF also can be inspected during transfers by opening the secondary containment drain lines at the surge tank to inspect for leakage. During the routine inspections at LERF, the aboveground piping system is inspected for signs of leakage and for general structural integrity. 30 During the visual inspection, particular attention is paid to valves and fittings for signs of cracking, deformation, and leakage.

33 6.2.2.3.4 Dike Erosion [F-2d(6)(a)(4)]. The LERF basins and dikes are 34 visually inspected weekly and after storms for severe erosion or other signs 35 of deterioration in the dikes from precipitation, wind, burrowing mammals, or 36 vegetation. 37

38 6.2.2.3.5 Structural Integrity [F-2d(6)(b)]. A written certification attesting to the structural integrity of the basin dikes, signed by a 39 qualified, registered professional engineer, is provided in Chapter 4.0. 40 41

42 6.2.2.3.6 Container Inspection [F-2b(1)]. Normal operation of the LERF does not involve the storage of dangerous waste in containers. Therefore, the 43 inspection requirements of this section normally are not applicable to the 44 45 LERF. Any containerized RCRA-regulated waste that might be generated at LERF 46 will be brought to the ETF and managed in accordance with WAC 173-303-200(1)47 and is discussed in Section 6.2.2.1.

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6.2.3 Inspection Log [F-2b and 2c]

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3 Observations made and deficiencies noted during an inspection are 4 recorded on inspection log sheets (also called turnover sheets). On 5 completion, the log sheet includes the inspector's printed name, signature. 6 date, and time; the log sheet is submitted for review and approval by ETF/LERF 7 management or their designee, as required by operating procedures. Once approved, the log sheet is kept in LERF and ETF files. Inspection records are 8 9 retained at the ETF, or other approved locations, for a minimum of 5 years. 10 The inspection records are used to help determine any necessary corrective actions. Problems identified during the inspections are prioritized and 11 12 addressed in a timely fashion to mitigate health risks to workers, maintain 13 integrity of the TSD units, and prevent hazards to public health and the 14 environment. 15

16 If while performing an inspection, a leak or spill is discovered, 17 facility management responds per the building emergency plan (Appendix 7A). 18 Action is taken to stop the leak and determine the cause. The waste is 19 removed from the secondary containment in a timely manner that prevents harm. 20 to human health and the environment. 21

6.2.4 Storage of Ignitable or Reactive Wastes [F-2d(3)]

The LERF could receive an aqueous waste that is designated reactive or ignitable. Any aqueous waste exhibiting these characteristics is managed (e.q., through blending in LERF) such that the waste no longer exhibits the reactive or ignitable characteristics. 29

30 Though unlikely, the ETF secondary waste might have the characteristics 31 of being reactive or ignitable. The Hanford Fire Department performs annual fire inspections of the ETF using a checklist developed specifically for 32 33 facilities that handle dangerous and/or mixed waste. 34

36 6.3 PREPAREDNESS AND PREVENTION REQUIREMENTS [F-3]

38 The following sections document the preparedness and prevention measures 39 taken at LERF and ETF. 40

42 6.3.1 Equipment Requirements [F-3a]

44 The following sections describe the internal and external communications 45 systems and the emergency equipment required.

47 6.3.1.1 Internal Communications. When operators are present at the LERF, the operators carry mobile (hand-held) two-way radios to maintain contact with 48 242-A Evaporator and ETF personnel. The operators at LERF are informed of 49 50 emergency situations (e.g., building and/or area evacuations, take-cover events, high airborne contamination, fire, and/or explosion), and are provided 51

with emergency instructions by several systems. These systems include the mobile two-way radios, and the telephone in the LERF instrument building.

The ETF is equipped with an internal communication system to provide immediate emergency instruction to personnel. The onsite communication system at the ETF includes telephones, mobile two-way radios, a public address system, and alarm systems. The telephone and radio systems provide for intraplant communication as well as external communication. Provisions are made to appropriately respond to various emergencies, including the following alarm-activated emergency situations: building evacuations, fire and/or explosion, loss of essential services, loss of ventilation, radioactive discharges, and high airborne contamination. Chapter 7.0 provides additional information on the response activities.

15 Immediate emergency instruction to personnel is provided by a public 16 address system via speaker horns and ceiling-mounted speakers located 17 throughout the building. The public address system is coupled to building 18 telephone systems to provide telephone accessed voice paging. The ETF alarms are annunciated via elements of the public address system. The general 19 telephone system, which carries various communication signals (e.g., 20 21 telephone, crash alarm), is linked to the Hanford Site integrated voice data 22 telecommunications system. 23

6.3.1.2 External Communications [F-3a(2)]. The LERF and its operators are equipped with devices for summoning emergency assistance from the Hanford Fire Department, the Hazardous Materials Response Team, and/or local emergency response teams, as necessary. External communication is made by either a telephone communication system or mobile two-way radios. The LERF telephone is available in the instrumentation building. Personnel assigned to emergency response organizations are reached in the following ways:

- Telephone number 911--is the contact point for the Hanford Site; on notification, the Hanford Patrol Operations Center notifies and/or dispatches required emergency responders
- Telephone number 373-3800--single point of contact for the emergency duty officer; this number can be dialed from any Hanford Site telephone
- Two-way radio system--consists of hand-held; the system accesses the Hanford Site emergency network and can summon the Hanford Fire Department, Hanford Patrol, and/or any other assistance needed to deal with emergencies.

45 The ETF is equipped with devices for summoning emergency assistance from 46 the Hanford Fire Department and/or local emergency response teams as 47 necessary. External communication is made via a telephone communication 48 system or two-way radios.

50 Telephones are provided at numerous locations throughout the ETF. In 51 addition, the following external communication systems are available for 52 notifying persons assigned to emergency response organizations:

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- Fire alarm pull boxes and fire sprinkler flow monitoring devices-connected to a system monitored around the clock by the Hanford Fire Department
- Telephone number 911--contact point for the Hanford Site; on notification, the Hanford Patrol Operations Center notifies and/or dispatches required emergency responders
- Telephone number 373-3800--single point of contact for the emergency duty officer; this number can be dialed from any Hanford Facility telephone
- Crash alarm telephone system--consists of selected telephones that automatically are disassociated from the regular system and connected to control stations
- Priority message system (Management Bulletin)--a network of telefax machines used to disseminate information to personnel
- The DOE-RL radio system--radio systems and frequencies available for emergency communications.

23 6.3.1.3 Emergency Equipment [F-3a(3)]. The LERF and ETF rely primarily on 24 the Hanford Fire Department to respond to fires and other emergencies. The Hanford Fire Department is capable of providing rapid response to fires within 25 26 the 200 East Area. All LERF and ETF operators are familiar with the LERF and 27 ETF contingency plans (Chapter 7.0) and are trained in the use of emergency pumping, fire, and communications equipment. The Hanford Site maintains a 28 sufficient inventory of heavy equipment (i.e., bulldozers, cranes, road 29 30 graders) for emergency response. 31

32 Portable fire extinguishers, fire control equipment, spill control 33 equipment, and decontamination equipment are available at various locations in 34 the ETF. 35

36 Fire control equipment is available at the ETF and could include the 37 following: 38

- Fire extinguishers (all-utility use, dry chemical), good for use on small fires
- Automatic fire suppression systems installed in the ETF control room and electrical room
- Fire alarm pull boxes
- A water spray system is installed in the operating and administrative portions of the ETF.

Respirators, hazardous material protective gear, and special work
procedure clothing for ETF personnel are kept in the change room at the ETF.
Safety showers are located in convenient locations in the ETF. Portable

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emergency eye washes are used at the ETF. Water for these devices is supplied from the ETF sanitary water system.

6.3.1.4 Water for Fire Control [F-3a(4)]. A water main is not provided to the LERF. Water for fire control is supplied by the Hanford Fire Department trucks for fires requiring high water volume and pressure. Each fire station normally has a truck equipped with a hydraulically operated aerial ladder, and one pumper (backup fire engine, without a boom, that is used if the aerial 8 9 ladder is inoperable). Fire engines have a pumping capacity of at least 10 5,600 liters of water per minute. Other fire protection equipment uses 11 chemicals rather than water as an extinguishing media. 12

The ETF is serviced by two 12-inch raw water lines that are tied into the 200 East Area raw water distribution grid. These lines provide a looped configuration that supplies two independent sources of raw water for fire protection and raw water uses. Connections from the ETF raw water system supply fire hydrants and the wet-pipe sprinkler system.

In the event that water pressure is lost, the Hanford Fire Department is equipped with fire engines to provide needed water.

6.3.2 Aisle Space Requirement [F-3b]

The operation of the LERF does not involve aisle space. Nevertheless, the LERF and the individual basins are easily accessible to emergency response personnel and vehicles. A 6.1-meter-wide service road runs along the base of the basin area on the east, south, and west sides within the operational security fence.

31 Aisle spacing at ETF is sufficient to allow the movement of personnel and 32 fire protection equipment in and around the containers. This storage arrangement also meets the requirements of the National Fire Protection 33 Association and the Life Safety Code (NFPA 1996) for the protection of 34 35 personnel and the environment. A minimum 0.76-meter aisle space is maintained 36 between rows of containers as required by WAC 173-303-630(5)(c). 37

6.4 PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT [F-4]

The following sections describe preventive procedures, structures, and equipment.

6.4.1 Unloading Operations, Spill Prevention, and Control [F-4a]

47 Underground pipelines that transfer aqueous waste to and from the LERF 48 are encased in a secondary pipe. If a leak is detected in a pipeline, flow in the pipeline will be stopped and the cause of the leak investigated and 49 remediated. 50 51

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I If it is required to transfer aqueous waste from one LERF basin to another, submersible pumps are located in risers at the northwest corner of a basin. Valves are closed or opened depending on the direction of the fluid transfer. Pumps are started, providing a cumulative flow of between 2,000 and 3,000 liters per minute into another basin.

7 The ETF Load-In Station is monitored continuously during tank-filling 8 operations and filling is stopped immediately if leaks occur. Care is taken 9 to ensure that even minor leaks are cleaned up immediately and disposed of in 10 accordance with approved management procedures. Any spill that is determined 11 to be a dangerous waste will be managed according to the requirements of 12 WAC 173-303.

6.4.2 Run-Off [F-4b]

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The LERF is constructed and operated to ensure that all aqueous waste is contained within the basins. The basins are designed and operated to prevent overtopping (Section 6.2.2.3.1). Furthermore, the basins are provided with very low-density polyethylene floating covers to prevent the introduction of precipitation into the basins. The basins also are graded to ensure that all precipitation outside the basins is directed away from the surface impoundments.

The basins are constructed so that the top of the basin dikes are approximately 3 meters abovegrade. The exterior side slopes of the basins have a 2.25 (horizontal) to 1 (vertical) slope. Run-on of precipitation to the basins from the surrounding area is not possible because the surrounding area slopes away from the LERF.

Dangerous waste and hazardous chemical handling areas at the ETF are designed to contain spills, leaks, and wash water, thereby preventing run-off and subsequent releases. All dangerous and/or mixed waste loading and unloading areas are provided with secondary containment structures as described in Chapter 4.0.

38 6.4.3 Water Supplies [F-4c]

40 The LERF uses operating practices, structures, and equipment to prevent the contamination of natural water supplies (i.e., groundwater and surface 41 water). The LERF is monitored closely during operation to detect abnormal 42 43 conditions (e.g., leaks), and regularly inspected to detect equipment and structural deteriorations that could allow possible water supply 44 45 contamination. The basins are provided with a leachate collection system that 46 is designed to contain any leachate generated. These systems, in conjunction 47 with the double-composite liner system and underlying low permeable clay liner, ensure that should a release occur, the release will be fully contained 48 49 within the basin configuration and, therefore, water supplies will be protected. Appendix 7Å provides information on procedures that are 50 implemented if a release is detected at the LERF. 51

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There are no drinking water wells near the ETF. Therefore, a release would not immediately contaminate drinking water supplies. The ETF uses 2 operating practices, structures, and equipment to prevent the contamination of 3 4 natural water supplies (i.e., groundwater and surface water). The ETF is monitored during operation to detect abnormal conditions, and is inspected 5 regularly to detect equipment and structural deteriorations that could allow 6 7 spills to the environment. Areas in contact with dangerous and/or mixed waste 8 are monitored continuously during operation through a series of level and 9 pressure indicators, leak detection alarms, equipment failure alarms, and control panel readouts. In addition, the ETF is inspected regularly for the 10 11 presence of leaks or other offnormal conditions wherever possible (in all 12 areas that can be safely entered).

In addition to detailed operating practices, structures and equipment are used at the ETF to prevent contamination of water supplies. The structures and equipment designed to prevent contamination of water supplies are the same as the structures and equipment used to prevent run-off from dangerous and/or mixed waste handling areas.

6.4.4 Equipment and Power Failure [F-4d]

The storage function of the LERF is not affected by loss of power and a temporary loss of power would not pose a threat to the environment. Loss of electrical power would not cause the storage of the waste to be jeopardized. For process condensate transferred from the 242-A Evaporator, appropriate valving procedures are followed to ensure a smooth restart of the flow to the LERF in the event of a power failure at the 242-A Evaporator. Pump equipment failure is addressed by operations personnel at the 242-A Evaporator.

The ETF does not have a standby power source. Power to selected lighting, computers, and process controls is configured with an uninterruptible power supply. During partial loss of normal power, the effected pumps and subsystems will be shut down. Complete loss of power to the ETF shuts down the entire ETF except for the instruments in the control room connected to the uninterruptible power supply. Redundant pumps allow the process to continue to operate when only one component is out of service.

When power at the ETF is lost, the valves assume a fail-safe position to allow the process to remain in a safe shutdown mode until restoration of power. This action allows the operators to perform equipment surveys during shutdown and to confirm that there are no safety issues because the ETF is shut down. Because a power failure would also shutoff flow into the ETF, there will not be any increase in volume in any of the holdup basins, tanks, or other systems.

A combination of reliability, redundancy, maintenance, and repair features are used in the ETF equipment and systems to minimize random failure of equipment. For crucial systems such as ventilation filters, redundant trains are provided to mitigate equipment and system failure. Spare parts are maintained for essential production and safety equipment.

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6.4.5 Personnel Exposure [F-4e]

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At the LERF and ETF, operating practices, structures, and equipment are used to prevent undue exposure of personnel to dangerous and/or mixed waste. Protective clothing and equipment are used by all personnel handling waste. All operations are conducted so that exposure to dangerous and/or mixed waste, and hazardous and radioactive materials are maintained ALARA.

9 Protective clothing and equipment are prescribed for personnel handling 10 chemicals or dangerous waste. Before the start of any operation that could 11 expose personnel to the risk of injury or illness, a review of the operation 12 is performed to ensure that the nature of hazards that might be encountered is 13 considered and appropriate protective gear is selected. Personnel are 14 instructed to wear personal protective equipment in accordance with training, 15 posting, and instructions.

17 A change trailer at LERF is located between basins 42 and 43. In 18 addition, the change trailer has an operations office for working with 19 procedures. Exits within the change trailer are clearly marked. A storage 20 building is located within the perimeter fence, northwest of the basins. The LERF storage building also is provided with separate storage areas for clean 21 22 and contaminated equipment. A decontamination shower and decontamination 23 building is located at the 272-AW Building, approximately 1.6 kilometers from 24 the LERF or at the ETF. 25

The ETF has eyewash stations and safety showers in convenient locations for use by personnel. The following structures and equipment were incorporated into the ETF design to minimize personnel exposure.

- Offices, control room, clean- and soiled-clothes storage areas, change rooms, and the lunchroom are situated to minimize casual exposure of personnel.
- Building exit pathways are located to provide rapid egress in emergency evacuations.
- Emergency lighting devices are located strategically throughout the ETF.
- Audio and/or visual alarms are provided for all room air samplers, area alarms, and liquid monitors. Visual readouts for these alarm systems are located in less contaminated areas to minimize exposure to personnel.
- Areas for decontaminating and maintaining equipment are provided in contaminated areas to limit the spread of contamination to uncontaminated areas such as the control room.
- Instrument interlock systems are provided that automatically return process operations to a safe condition if an unsafe condition should occur.

 The ETF ventilation systems are designed to provide air flow from uncontaminated zones to progressively more contaminated zones.

Whenever possible, exposures to hazards are controlled by accepted engineering and/or administrative controls. Protective gear is used where effective engineering or administrative controls are not feasible.

6.5 PREVENTION OF REACTION OF IGNITABLE, REACTIVE, AND INCOMPATIBLE WASTE [F-5 through F-5b]

12 Typically aqueous waste managed at the LERF or ETF does not display the 13 characteristics of reactivity or ignitability. Any aqueous waste streams 14 exhibiting these characteristics are blended or mixed at LERF to a 15 concentration where the waste no longer exhibits reactive or ignitable 16 characteristics.

No incompatible aqueous waste is expected to be stored or treated at the LERF or ETF (Chapter 3.0). Therefore, the requirements of WAC 173-303-806(4)(a) are not applicable.

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Table 6-1. Visual Inspection Schedule for the ETF. (sheet 1 of 3)

4	Item	Inspection	Frequency	Inspected by					
5		Main Treatment Train							
5	Surge tank system	Inspect area for leaks. Note any unusual noises or vibration from the system pumps. Inspect secondary containment system for signs of deterioration.	Daily	Process operator					
	Rough filter	Inspect for leaks.	Daily*	Process operator					
	Ultraviolet oxidation system	Inspect module for leaks. Inspect peroxide storage tank, ancillary equipment for leaks.	Daily*	Process operator					
	pH adjustment tank	Inspect tank and ancillary equipment for leaks.	Daily*	Process operator					
	H ₂ O ₂ decomposer	Inspect tank and ancillary equipment for leaks.	Daily*	Process operator					
	Fine filter	Inspect module for leaks.	Daily*	Process operator					
	Degasification system	Inspect module for leaks. Note any unusual noises or vibration from the degasification blower.	Daily*	Process operator					
	Reverse osmosis system	Inspect tanks and ancillary equipment for leaks. Note any unusual noises or vibration from the system pumps.	Daily*	Process operator					
	Polishers	Inspect tanks and ancillary equipment for leaks. Inspect polishers for proper resin level and mixing.	Daily*	Process operator					
	Effluent pH adjustment tank	Inspect tank and ancillary equipment for leaks.	Daily*	Process operator					

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Table 6-1. Visual Inspection Schedule for the ETF. (sheet 2 of 3)

Item	Inspection	Frequency	Inspected b
Verification tanks	Inspect tanks and ancillary equipment for leaks. Note any unusual noises or vibration from the system pumps. Inspect secondary containment system for signs of deterioration.	Daily	Process operator
	Secondary Treatment Train		
Secondary waste receiving tank	Inspect tank and ancillary equipment for leaks.	Daily	Process operator
ETF evaporator	Inspect tank and equipment for leaks. Note any unusual noises or vibration from the system pumps or compressor.	Daily*	Process operator
Concentrate tank Inspect tank and ancillary equipment for leaks. Thin film dryer Inspect tanks and ancillary equipment for leaks (viewed through window). Note any unusual noises or vibration form the system pumps or blower.		Daily*	Process operator
		Daily*	Process operator
Container handling	Inspect area for spills, leaks, accumulated liquids.	Daily	Process operator
Container handling Container handling Container Secondary containment, including corrosion and cracks in secondary containment foundation and coating. Inspect container labels to ensure that they are readable.		Weekly	Process operator
Resin dewatering	Inspect module for leaks. Note any unusual noises or vibration form the system pumps or blower.	Daily*	Process operator

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Table 6-1. Visual Inspection Schedule for the ETF. (sheet 3 of 3)

Item	Frequency	Inspected b	
	Support Systems		
Vessel ventilation system	Daily	Process operator	
Sump tank system	Daily	Process operator	
	Safety Systems		
Eye wash stations	Check status; check for adequate pressure.	Monthly	Process operator
Safety showers	Check status; check for adequate pressure.	Monthly	Process operator
•	Emergency Systems		
Fire extinguishers	Check for adequate charge.	Monthly	Process operator
Emergency lighting	Test operability.	Monthly	Process operator
	Processing Area		
Uninterruptible power supply	Annually	Electrician process operator	

* Stated inspection frequency to be performed only during ETF operations.

HEPA - High efficiency particulate air

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Table 6-2. Inspection Plan for Instrumentation Monitoring. (sheet 1 of 2)

1 2	Table 6-2. Inspection Plan for Instrumentation Monitoring. (sheet 1 of 2)							
3	Item	Frequency	Inspected by					
4		Main Treatment Train						
5 6	Leak detector LAH-20B009	Monitor for leakage in the surge tank drainage sump.	Continuously	Computer Process Operator				
7 8	Level alarm LAH-60A013	Monitor surge tank level to prevent overflow.	Continuously	Computer Process Operator				
9 10	Level alarm LAHL-60C-111	Monitor liquid levels in the pH adjustment tank to prevent overflow.	Continuously	Computer Process Operator				
11 12	Level alarm LAHL-60F-101	Continuously	Computer Process Operator					
13 14	Level alarm LAHL-60F-201	Monitor liquid levels in the second RO feed tank to prevent overflow.	Continuously	Computer Process Operator				
15 16	Level alarms LAHL-60F-211	Monitor liquid levels in the effluent pH adjustment tank to prevent overflow.	Continuously	Computer Process Operator				
17 18	Level transmitter LT-60H001A/B/C	Monitor liquid level in verification tanks to prevent overflow.	Continuously	Computer Process Operator				
19 20	Leak.detector LAH-20B010	Monitor for leakage in the verification tank drainage sump.	Continuously	Computer Process Operator				
21		Secondary Treatment Train						
22 23	Level alarm LAHL-60I-001A/B	Monitor liquid levels in secondary waste receiver tanks A and B to prevent overflow.	Continuously	Computer Process Operator				
24 25	Level alarm LAHL-60J-001A/B	Monitor liquid levels in concentrate tanks A and B to prevent overflow.	Continuously	Computer Process Operator				
26 27	Level alarm LAHL-60I-107	Monitor liquid levels in the evaporator tank to prevent overflow.	Continuously	Computer Process Operator				
28 29	Level alarm LAHL-60J-036	Monitor liquid levels in the spray condenser tank to prevent overflow.	Continuously	Computer Process Operator				

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Table 6-2.	Inspection Plan	for	Instrumentation	Monitoring.	(sheet 2 of 2)
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	Item	Inspection	Frequency	Inspected by
1 2	Level alarm Monitor liquid levels in the distillate flash LAHL-60I-108 tank to prevent overflow.		Continuously	Computer Process Operator
3 4	Level alarm LAH-60I-119	Monitor liquid levels in the entrainment separator tank to prevent overflow.	Continuously	Computer Process Operator
5 6	Level transmitter LAH-20B001	Continuously	Computer Process Operator	
7 8	Level transmitter LAH-20B002	Monitor liquid level in sump tank No. 2 to prevent overflow.	Continuously	Computer Process Operator
9 10 11 12	Leak detector LAH-20B003	Monitor for leakage to sump No. 1.	Continuously*	Computer Process Operator
	Leak detector LAH-20B005	Monitor for leakage to sump No. 2.	Continuously*	Computer Process Operator
13	Leak detector	Monitor for leakage from pipeline between ETF and load-in station.	Continuously*	Computer Process Operator
14	Leak detector	Monitor for leakage from pipeline between ETF and LERF.	Continuously*	Computer Process Operator
15	Leak detector	Monitor for leakage from pipeline between LERF and the 242-A Evaporator.	Continuously*	Computer Process Operator

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 \star In the event of a malfunction of one of the electronic leak detectors, daily visual inspections will be performed while the facilities are in operation.

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7 8 9 10		APPENDIX		
11 12	7A	BUILDING EMERGENCY PLAN FOR 200 AREA EFFLUENT TREATMENT FACILITY AND LIQUID EFFLUENT RETENTION FACILITY APP 7A-1		

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7.0 CONTINGENCY PLAN [G]

The WAC 173-303 requirements for contingency plans are satisfied in the following documents: the Building Emergency Plan for 200 Area Effluent Treatment Facility and Liquid Effluent Retention Facility, (Appendix 7A) and the Hanford Facility Contingency Plan [Attachment 4 of the Hanford Facility RCRA Permit (DW Portion)].

10 The unit-specific building emergency plan also serves to satisfy a broad 11 range of other requirements [e.g., Occupational Safety and Health 12 Administration standards (29 CFR 1910) and U.S. Department of Energy Orders]. 13 Therefore, revisions made to portions of this contingency plan document that 14 are not governed by the requirements of WAC 173-303 will not be considered as 15 a modification subject to review or approval by Ecology.

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8.0 PERSONNEL TRAINING [H]

The training plan provided in Appendix 8A discusses training requirements pertaining to 200 Area Liquid Effluent Facilities.

567 The training program is designed to be compliant with all applicable 8 federal, state, and DOE-RL training requirements. The training program complies with requirements contained within WAC 173-303-330 for the 9 10 development of a written dangerous waste training program. The training program is designed to prepare personnel to manage and maintain TSD units in a 11 safe, effective, efficient, and environmentally sound manner. In addition to 12 preparing employees to manage and maintain TSD units under normal conditions. 13 the training program ensures that employees are prepared to respond in a 14 prompt and effective manner should abnormal or emergency conditions occur. 15

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9.0 EXPOSURE INFORMATION REPORT

Exposure information for the LERF is discussed in the General Information $\Bar{Portion}$ (DOE/RL-91-28).

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10.0 WASTE MINIMIZATION [D-9]

To fulfill the requirements of 40 CFR 264.73(b)(9), a certification form that the LERF and the ETF have a waste minimization/pollution prevention program in place will be entered, annually, into the LERF and the ETF operating record.

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11.0 CLOSURE AND FINANCIAL ASSURANCE [1]

This chapter describes the planned activities and performance standards for closing LERF and ETF.

11.1 CLOSURE PLAN/FINANCIAL ASSURANCE FOR CLOSURE [I-1]

The LERF and ETF will be clean closed with respect to dangerous waste contamination that resulted from operation as TSD units, with closure of LERF 12 occurring first. To facilitate closure, the LERF retention basins are being viewed as consisting of seven components: the covers and primary liner, 13 drainage layer system/bentonite carpet liner, secondary liner, soil bentonite. internal and/or external piping, ancillary equipment, and concrete basins. To facilitate closure of ETF, ETF is being viewed as consisting of six components: tanks, internal and/or external piping, ancillary equipment, 18 concrete floors/dikes/encasements, structures, and soil directly beneath the structure. It is anticipated that closure of LERF and ETF will begin after 19 20 the projected 30-year active life of LERF and ETF. If it is determined that clean closure is not possible, the closure plan will be modified to address 22 required postclosure activities. 23

Uncontaminated structures either will be left for future use or disassembled, dismantled, and removed for disposal. Uncontaminated equipment and structures could include aqueous makeup, HVAC and piping, steam condensate and cooling water piping, and the control room and office areas.

Clean closure requires decontamination or removal and disposal of all dangerous waste, waste residues, contaminated equipment, soil, or other material established in accordance with the clean closure performance standards of WAC 173-303-610(2). This and future closure plan revisions will provide for compliance with these performance standards.

11.2 CLOSURE PERFORMANCE STANDARD [I-1a]

Clean closure, as provided for in this plan, and in accordance with WAC 173-303-610(2), will eliminate future maintenance and will be protective of human health and the environment by removing or reducing chemical contamination at LERF and ETF to levels that eliminate the threat of contaminant escape to the environment.

44 After closure, the appearance of the land where the LERF and ETF are 45 located will be consistent with the appearance and future use of its surrounding land areas. This plan proposes to leave clean structures and equipment in place after closure for potential use in future operations. This 46 47 need will be evaluated at the time of closure. 48 49

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11.2.1 Closure Standards for Metal Surfaces, Rubber, Tanks, and Concrete

This closure plan proposes use of a 'clean debris surface' (defined in the following paragraph) as the clean closure performance standard for the metal surfaces, rubber (i.e., basin covers, liners, etc.), tanks, and concrete that will remain after closure. This approach is consistent with Ecology guidance (Ecology 1994a) for achievement of clean closure. Additionally, adherence to this guidance ensures that all residues have been removed as required by WAC 173-303-640 for clean closure of the ETF tank systems. The ETF verification tanks will be considered "clean" if the delisting limits were not exceeded for the effluent in the tanks. If the delisting limits were exceeded, closure activities will be as described in Section 11.3.4.3.

14 The clean debris surface standard is verified visually. "A clean debris 15 surface means the surface, when viewed without magnification, shall be free of 16 all visible contaminated soil and hazardous waste except residual staining 17 from soil and waste consisting of light shadows, slight streaks, or minor 18 discolorations and soil and waste in cracks, crevices, and pits may be present 19 provided that such staining and waste and soil in cracks, crevices, and pits 20 shall be limited to no more than 5% of each square inch of surface area" (40 21 CFR 268.45). When a physical extraction method is used on concrete, the performance standard is based on removal of the contaminated layer of debris. 22 23 The physical extraction performance standard for concrete is removal of 24 0.6 centimeter of the surface layer and treatment to a clean debris surface. 25 Inspections to verify achievement of a clean debris surface will be performed 26 and documented. 27

11.2.2 Closure Standards for Internal and External Piping

The internal and external piping of both LERF and ETF will be flushed and drained as part of closure. The rinsate will be sampled and analyzed. Results less than designation limits for the constituents of concern will be accepted as indicating that the piping is clean with respect to dangerous waste or dangerous waste residues. If the rinsate designates as a dangerous waste, the piping will be flushed again. If it is not possible to meet the clean closure performance standard, the particular piping of concern will be removed an disposed of accordingly.

41 11.2.3 Closure Standards for Ancillary Equipment

Ancillary equipment is defined as pumps and other miscellaneous equipment not otherwise specified in this closure plan. Ancillary equipment will be removed and disposed.

48 11.2.4 Closure Standards for Underlying Soils

50 The LERF retention basins have a leachate collection system for leaks or 51 spills that channels the liquid to drains or sumps. The collected liquid is 52 pumped back into the basins, thereby preventing spills from reaching the soil.

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The soil only could be contaminated if the secondary liner had failed. To determine if failure occurred, the primary liner will be inspected for leaks. holes, or punctures and the drainage gravel and bentonite carpet liner underneath the primary liner will be sampled and analyzed for contamination. 4 5 If the drainage gravel analytical results determine that the constituents of concern are at or below agreed to regulatory cleanup levels (i.e., Hanford 6 7 Site soil background levels (DOE-RL 1993) and/or residential exposure 8 assumptions according to the Model Toxics Control Act), the gravel will be 9 considered clean for closure. Only if contamination is found in the drainage gravel/bentonite carpet liner will the secondary liner surfaces be inspected 10 11 for leaks, holes, or punctures, which (if existing) could have provided a 12 pathway to soil for contamination (refer to Chapter 4.0, Figure 4-3 for basin 13 diagram). If no leaks, holes, or punctures are found in the primary liner or 14 if the drainage gravel/bentonite carpet liner is found not to be contaminated. the soil will be considered to be clean closed. However, if leaks, holes, or 15 16 punctures are found in the primary liner or the gravel is contaminated, the 17 secondary liner surfaces will be inspected. If no leaks, holes, or punctures 18 are found in the secondary liner surfaces, the soil will be considered clean 19 closed. If such leaks, holes, or punctures are identified, potential soil 20 contamination will be investigated. Soil will be sampled and analyzed for 21 constituents of concerns. If the soil analytical results determine that the constituents of concern are at or below agreed to regulatory cleanup levels, 22 23 the soil will be considered clean closed. 24

Clean closure of soil under the ETF will be accomplished by demonstrating that the coated concrete floor kept contaminants from reaching the soil. coated concrete floor provided secondary containment for all the tanks and process piping. Unless inspections identify potential through-thickness 29 cracks indicating containment failure and a subsequent potential for soil 30 contamination from TSD unit operations, the soil will be considered clean closed. However, if inspections identify such cracks and there have been documented spills in the vicinity, potential soil contamination will be 33 investigated. Soils will be sampled and analyzed for constituents of 34 concerns. If the soil analytical results determine that the constituents of concern are at or below agreed to regulatory clean up levels, the soil will be considered clean closed. Regulatory cleanup levels are defined by the Hanford 36 Facility RCRA Permit (Condition II.K.). If verification sampling is required, 37 38 a sampling analysis plan will be prepared before closure in a manner 39 consistent with Ecology guidance (Ecology 1994a) for achievement of clean 40 closure.

11.3 CLOSURE ACTIVITIES [I-1b]

45 The LERF and ETF were designed for a 30-year active life. At the time of closure, the closure plan will be modified as necessary to reflect current 46 47 regulation or informational revisions. If it is determined that clean closure 48 is not possible, the closure plan will be modified to address required 49 postclosure activities.

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11.3.1 General Closure Activities

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The approach to LERF closure is to dispose of accumulated basin aqueous waste by processing the waste through ETF. Primary basin liners and covers will be decontaminated or disposed of as appropriate. Any remaining solids (residue) within basins will be removed, designated, and disposed of accordingly. Piping associated with LERF closure is intended to be decontaminated and left in place. Rinsate generated during decontamination also will be disposed of through ETF. Sampling will assess whether contamination beneath the primary liner has occurred. Contamination, if present, will be managed in compliance with regulatory requirements.

The approach to ETF closure is to process any aqueous waste through the effluent treatment system. Any containerized dangerous waste and/or mixed waste will be transferred to other TSD units. All structures and equipment will be decontaminated and/or disposed. Piping associated with ETF closure is intended to be decontaminated and left in place. Contamination, if present, will be managed in compliance with regulatory requirements.

Equipment or materials used in performing closure activities will be decontaminated or disposed at a permitted facility.

11.3.2 Constituents of Concern for Closure for the Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility

Using the list of dangerous waste numbers in the Part A, (Chapter 1.0) process knowledge and the risk to human health and the environment, the constituents of concern for closure will be determined at through the data quality objective process.

11.3.3 Removing Dangerous Waste [I-1b(2)]

At the start of LERF closure, aqueous waste will be transferred sequentially from each basin to ETF for treatment. At a treatment rate of about 284 liters per minute, it will take approximately 60 days to empty a full basin. Basin covers will remain in place to prevent possible wind dispersion of waste until all basin waste has been removed.

All of the aqueous waste inventory at the ETF will be processed before closure. Any residue remaining in piping, equipment, or the LERF liner will be removed to an appropriate disposal unit. All containerized waste will be dispositioned. All secondary waste in containers will be transferred to an appropriate TSD unit.

48 11.3.4 Decontaminating Structures, Equipment, and Soils [I-1b(3)] 49

50 This section discusses the activities necessary to implement a clean 51 closure strategy for the LERF and ETF. Before closure activities begin, any 52 waste inventory stored will be removed. After the waste inventory is removed, clean closure of the LERF covers and primary liner, drainage layer/leachate collection system/bentonite carpet liner, secondary liner, soil bentonite, the internal piping, ancillary equipment, and the concrete catch basins will be accomplished by decontaminating the components as necessary, and demonstrating that clean closure performance standards are met (Section 11.1.1). To facilitate closure of ETF, tanks, internal piping, external piping, ancillary equipment, concrete floors/dikes/encasements, structures, and soil directly beneath the structure will be decontaminated, as necessary, to demonstrate that the clean closure performance standards are met.

Removal and disposal of most of the components will be determined at time of closure. Clean closure of the soil will be accomplished by demonstrating that the concrete kept contaminants from reaching the soil.

11.3.4.1 Covers and Liners. After all pumpable waste has been removed from a given basin at LERF, the cover for that basin will be removed. The cover either will be decontaminated or disposed of appropriately. If the cover is disposed of, the cover will be cut up within the basin and loaded into a lined dump truck for transport and disposal. If the covers are to be reused, an initial decontamination effort will be made by spraying the underside of the cover while in place over a basin. The intent of preremoval spraying is to minimize subsequent decontamination efforts and to use the basin as a wash water catchment. Each cover will be inspected visually for physical damage in the same manner as the primary liners. Visible signs of damage to the cover will be repaired as specified by the cover manufacturer. The cover decontamination procedure will be to position a cover into its basin and wash the cover. Any openings, such as for vents, will be sealed temporarily so that rinsate cannot seep through. The method and degree of washing will be the same as necessary for the respective basin liner. The generated rinsate will be transferred from the basin to the ETF or appropriate TSD unit.

32 The primary liner will be inspected visually for physical damage and 33 surveyed radiologically before any decontamination efforts. Physical damage will be defined as tears, holes, or punctures such that the liner would not 34 hold water. A description and location of any physical damage found will be 35 36 noted in a inspection record. Visible signs of damage to the liner will be repaired per procedures specified by the manufacturer before decontamination 37 38 to prevent liquid solutions from driving potential contamination down into the 39 drainage gravel. The purpose of the inspection will be twofold: to identify and map any physical damage in the primary liner that might have allowed 40 contaminants a pathway to the drainage gravel below; and to identify areas 41 that potentially are contaminated with dangerous waste or dangerous waste 42 residues. The inspection standard for the liner will be a clean debris 43 surface as defined in Section 11.1.1.1. The inspection of the liner for a 44 45 clean debris surface will be documented on an inspection record. Those areas 46 already meeting the standard can be clean closed as is, based on Ecology 47 acceptance of the completed record. 48

Those potentially contaminated areas will undergo decontamination to meet. the clean closure standard of a clean debris surface. Plastic surfaces indicated by visual examination as being potentially contaminated will be

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decontaminated through use of physical extraction technologies such as high-pressure steam and water sprays coupled with a detergent wash.

Achievement of a clean debris surface will be documented on an inspection record. Decontamination rinsate will be transferred directly to the ETF or transferred to another basin before ultimate disposal. If it is not possible to meet the clean closure performance standard, or there is no further need for the liner, the primary liner could be removed, designated, and disposed of accordingly. The inspections for a clean debris surface will be documented on an inspection record.

12 11.3.4.2 Drainage Laver/Bentonite Carpet Liner/Secondary Liner. Assessment 13 of contamination beneath the LERF's primary liner will be performed within 14 each basin by sampling the drainage gravel. Biased rather than random 15 location selection will be used to increase the probability of detecting 16 leachate contamination. Sampling points will be chosen where physical damage 17 was noted during the inspection of the primary liner or areas where the 18 underlying material porosity and permeability and the hydraulic head would 19 most likely drive any leachate. The leakage rate through the liner would 20 increase toward the bottom of the liner as hydraulic head increases. Any 21 leakage that did occur in the sloped sides could be expected to travel down 22 slope through the geotextile between the primary and secondary liner until 23 reaching the bottom of the liner. Therefore, the most likely area of 24 contamination would be the drainage gravel. 25

Gravel samples will be collected by removing the bentonite carpet liner and making an incision in the geotextile. Sampling will be performed in accordance with existing procedures at the time of sampling. Special care will be needed in sampling for volatiles. To aid in ensuring sample integrity, the initial removal of gravel to create the gravel profile will not be done unless the samples can be collected immediately.

Sample collection will occur immediately after profile exposure. If no constituents of concern are found above soil closure performance standards (Section 11.1.1), no further analysis will be done. If the initial sample analysis indicates liner leakage, analysis of the bottom sample will be performed to determine the depth of contamination. Additional gravel samples from different locations will be taken to determine the spatial extent of contamination.

41 A visual assessment of the underlying basin integrity will be made at the 42 bottom of each sampled location and wherever else gravel is removed. If the 43 basin is perceived to be damaged such that leakage could have occurred beneath 44 the secondary liner, an amendment to the closure plan will be submitted to 45 allow time for additional sampling and possible gravel removal. Sampling beneath the secondary liner, if necessary, will be attempted in accordance with sampling procedures for beneath the primary liner. Sampling beneath the 46 47 48 secondary liner has not been extensively addressed because of the remote 49 probability of its occurrence. The drainage gravel will be the preferred flow path even if minor leaks exist in the secondary liner. The secondary liner is 50 51 resting on a soil/bentonite bed, which would tend to seal any punctures in the secondary liner as hydraulic head built up. 52

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Sampling and disposal objectives will be determined at the time of closure activities through the data quality objectives process.

11.3.4.3 Tanks. After all pumpable waste has been removed from the tanks at ETF, the interior of the tanks, including the internal components such as the agitator, will be washed down by adding or spraying with steam, a water-soluble cleaner, or other approved method. The tanks will be emptied and the interiors visually examined.

After rinsing, the tanks will be inspected visually for compliance with the performance standard. Because of possible radiation exposure, visual inspection might be made remotely using a camera or other device that allows verification of meeting the standard. If any areas are found to not meet the clean debris surface performance standard, these areas will be decontaminated in-place. Per the debris rule, only removal of contaminants from the surface layer is necessary for metal surfaces. Contamination will be removed from the surface layer using either high-pressure water blasting (a physical extraction method) or by hand or remote wiping, washing, brushing, or scrubbing using an approved cleaner, and rinsing with water or by other appropriate methods.

The outside of the tanks also will be inspected for compliance to the performance standard. Any areas found to not meet this performance standard will be decontaminated in-place. Contamination will be removed from the surface layer using any of the methods described for internal tank decontamination or another appropriate method. Before using decontamination solutions on the outside of the tanks, the floor will be inspected for cracks or other openings that could provide a pathway to soil. This inspection will be performed as described in Section 11.1.4.6 in conjunction with mapping of potential through-thickness cracks. Any such cracks will be mapped. The cracks will be sealed before beginning treatment or other engineered containment devices (e.g., portable catch basins, liners) will be used to collect and contain solutions.

Decontamination residues will be collected, designated, and managed as appropriate. If it is not possible to meet the clean closure performance standard, contaminated portions of the tanks could be removed, designated, and disposed of accordingly. The inspections for a clean debris surface will be documented on an inspection record.

40 11.3.4.4 Internal and External Piping and Ancillary Equipment. The internal piping for both LERF and ETF will be rinsed and the rinsate will be sampled 41 42 and analyzed for constituents of concern. The rinsate will be designated and 43 disposed of appropriately. If the rinsate does not designate based on the concentrations of the constituents of concern, the internal piping will be 44 45 blanked to ensure that the tanks are isolated and the piping will be 46 considered clean with respect to RCRA. If the rinsate designates as a 47 dangerous waste, the piping will be flushed again. If necessary the piping will be rinsed with a decontamination solution before sampling and analyses. 48 If it is not possible to meet the clean closure standard, portions of the 49 internal piping will be removed, designated, and disposed of accordingly. 50 The ancillary equipment will be removed, designated, and disposed of accordingly. 51 52

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External piping (transfer lines) between the 242-A Evaporator and LERF and between LERF and ETF will be flushed and the rinsate analyzed for constituents of concern. If the rinsate designates as a dangerous waste, the piping will be flushed again. If necessary the piping will be rinsed with a decontamination solution before sampling and analyses. If it is not possible to meet the clean closure standard, the piping will be removed and disposed of accordingly. If the rinsate does not designate, the piping will be considered clean and will remain in place.

If the rinsate designates as dangerous waste, rinsate from the external piping and LERF internal piping will be processed through ETF. Rinsate from ETF will be transferred to another TSD unit.

14 11.3.4.5 Concrete. At LERF, the concrete catch basins are located at the northeast corner of each retention basin, where inlet pipes, leachate risers, and transfer pipe risers emerge for the basin. The concrete catch basin is curbed, and coated with a chemical resistant epoxy sealant. The concrete catch basin is sloped so that any leaks or spills from the piping or connections will drain into the basin. At the ETF, the coated concrete floor and berm provides secondary containment for all the tanks and process piping.

22 At LERF and ETF, all concrete will be inspected visually and surveyed radiologically before any decontamination. The purpose of the inspection will 23 24 be twofold: to identify and map any cracks in the concrete that might have 25 allowed contaminants a pathway to the soil below (Section 11.1.2.3.); and to 26 identify areas that potentially are contaminated with dangerous waste or 27 dangerous waste residues. The inspection standard will be a clean debris surface as defined in Section 11.1.1. The inspection of the concrete for a 28 29 clean debris surface will be documented on an inspection record. Those areas 30 already meeting the standard can be clean closed as is. 31

32 Those potentially contaminated areas will undergo decontamination to meet 33 the clean closure standard of a clean debris surface. The concrete will be washed down, the rinsate collected, designated, and disposed of accordingly. 34 35 The concrete will be reinspected for a clean debris surface. Concrete 36 surfaces indicated by visual examination as still being potentially 37 contaminated will have the surface layer removed to a depth of 0.6 centimeter 38 by scabbling or other approved methods. This will not threaten the 39 environment, even if potential through-thickness cracks had been found during the inspection, because concrete decontamination (scabbling) will not employ 40 41 liquid solutions that could enter cracks and because scabbling residues will 42 be vacuumed away from cracks as any residue is generated. 43

Achievement of a clean debris surface will be documented on an inspection record. Decontamination residues will be collected, designated, and managed as appropriate. 47

11.3.4.6 Structures. If contaminated with either dangerous or mixed waste
 constituents, the ETF structures will be decontaminated and/or disassembled,
 if necessary, packaged, and disposed of in accordance with existing land
 disposal restrictions (WAC 173-303-140).

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Closure steps could include the following activities.

- Containerize (as necessary and practicable) and remove any remaining waste.
- Review operating records for spillage incidents and visually inspect storage area surfaces for evidence of contamination or for cracks that could harbor contamination or allow the escape of decontamination solutions. Inspect storage area surfaces for visible evidence of contamination (e.g., discoloration, material degradation, wetness, odor). If contamination is evident, the affected area(s) will be decontaminated.
- Decontaminate ETF walls and floors to minimize the potential for loose contamination and facilitate any required radiation surveys and/or chemical field screening. The structures could be cleaned by water rinse or high-pressure, low-volume steam cleaning coupled with a detergent wash. After decontamination, the walls and floors will be compared to closure performance standards.
- Collect rinsate and manage as dangerous waste for appropriate disposal.
- Secure (lock) personnel entries into building and post doors with appropriate warning signs.

Clean closure of structures will occur in accordance with WAC 173-303-610. Remediation of soil contamination beneath or around containment buildings will be performed in conjunction soil closure requirements.

11.3.4.7 Underlying Soils. Clean closure of soil under LERF's secondary liner will be accomplished by demonstrating that the liners and leak detection system kept containments from reaching the soil. The secondary liner provided secondary containment for the LERF basins. Unless inspections identify potential leaks, punctures, cracks, or tears indicating containment failure and a subsequent potential for soil contamination from TSD unit operations, the soil will be considered clean closed. However, if inspections identify such leaks, punctures, etc., potential soil contamination will be investigated.

Clean closure of soil under ETF will be accomplished by demonstrating that the coated concrete floor kept contaminants from reaching the soil. The coated concrete floor and bermed area provided secondary containment for all 44 the tanks and process piping. Unless inspections identify potential 45 46 through-thickness cracks indicating containment failure and a subsequent 47 potential for soil contamination from TSD unit operations, the soil will be considered clean closed. However, if inspections identify such cracks and 48 there have been documented spills in the vicinity, potential soil 49 contamination will be investigated. 50 51

Where it is possible to visually inspect directly beneath the tanks, a visual inspection will be performed. Where it is not possible to visually inspect beneath the tanks, an evaluation of the tank integrity will be made. The condition of the tank will be evaluated to determine if there was any potential for leakage. If no cracks, severe corrosion, or evidence of leaks are observed, it will be reasoned that mixed or dangerous waste solutions could not have penetrated to the soil directly below the tank.

External piping (transfer lines) between the 242-A Evaporator and LERF and LERF and ETF are double-lined with a leak detection system. If records indicate that no leaks from the primary piping occurred, the soil will be considered clean with respect to RCRA closure.

11.4 MAXIMUM WASTE INVENTORY [I-1c]

Each LERF basin is designed to store 24,605,000 liters. The maximum aqueous waste inventory for the three basins is 73,815,000 liters.

The ETF is constructed to treat and store aqueous waste streams. The treated effluent is stored in three verification tanks until it is determined if the effluent meets required standards. The summation of the three verification tanks is 7,608,654 liters. A secondary waste is generated during operation of the ETF. This secondary waste consists of mixed waste generated and containerized during the operation of the ETF and nonradioactive dangerous waste such as chemicals used in the various processes. The maximum waste inventory for the container storage of the secondary waste is 147,630 liters.

11.5 CLOSURE OF CONTAINERS, TANKS, AND SURFACE IMPOUNDMENTS [I-1d]

The following sections cover closure of containers, closure of tanks, and closure of surface impoundments.

11.5.1 Closure of Containers [I-ld(1)]

Containers at ETF will be used to contain dangerous waste in the event of a spill, unexpected release, or equipment failure. Containers will be used to accumulate nonradioactive dangerous waste and/or mixed waste. Any containers used to contain dangerous and/or mixed waste at the ETF will be disposed of in the appropriate manner. Containers of dangerous and/or mixed waste will not be left in the ETF after closure.

46 11.5.2 Closure of Tanks [I-1d(2)] 47

48 Clean closure of ETF will consist of the removal and disposal of all 49 dangerous waste and the decontamination and/or removal and disposal of 50 contaminated equipment, including tanks. The ETF was designed to incorporate 51 removable components. This design facilitates closure by allowing complete 52 removal of equipment contaminated with dangerous and mixed waste.

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11.5.3 Closure of Surface Impoundments [I-ld(4)]

At closure, all of LERF that received regulated waste will be closed in accordance with the requirements of WAC 173-303-650(6)(a)(i). All equipment, structures, and other material associated with closure of LERF will be decontaminated or removed in accordance with WAC 173-303-610(2). All basin waste and decontamination rinsate will be transferred to ETF. Sampling and testing will be conducted.

11.6 SCHEDULE FOR CLOSURE [I-1f]

Closure of LERF and ETF is not anticipated to occur within the next 30 years. The actual year of closure will depend on the time required for current waste to be processed and what role the LERF and ETF will play in processing additional waste generated during future activities in the 200 Areas. Other factors affecting the year of closure include changes in operational requirements, lifetime extension upgrades, and unforseen factors. When a definite closure date is established, a revised closure plan will be submitted to Ecology.

The activities required to complete closure are planned to be accomplished within 180 days. Should a modified schedule be necessary, a revised schedule will be presented and agreed to before closure.

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12.0 REPORTING AND RECORDKEEPING

Reporting and recordkeeping requirements that could be applicable to the Hanford Facility are described in Chapter 12.0 of the General Information Portion (D0E/RL-91-28). Not all of these requirements and associated reports and records identified in Chapter 12.0 of the General Information Portion are applicable to the LERF and the ETF. Those reporting and recordkeeping requirements determined to be applicable to the LERF and the ETF are summarized as follows:

- · Hanford Facility Contingency Plan and incident records (as identified in the General Information Portion):
 - Immediate reporting
 - Written reporting
 - Shipping paper discrepancy reports.
- Unit-specific Part B permit application documentation and associated plans
- Personnel training records
- Groundwater monitoring records
- Inspection records (unit)
- Onsite transportation documentation
- Land disposal restriction records
- Waste minimization and pollution prevention.

In addition, the following reports prepared for the Hanford Facility will contain input, when appropriate, from the LERF and the ETF:

- Quarterly Hanford Facility RCRA Permit modification report •
- Anticipated noncompliance
- Required annual reports.

Annual reports updating projections of anticipated costs for closure and postclosure will be submitted when the LERF and the ETF closure plan is submitted to Ecology (Chapter 11.0).

The LERF and the ETF Operating Record 'records contact' is kept on file 46 in the General Information file of the Hanford Facility Operating Record (refer to DOE/RL-91-28, Chapter 12.0).

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13.0 OTHER FEDERAL AND STATE LAWS [J]

Applicable federal, state, and local laws applicable to the LERF and the ETF are discussed in Chapter 13.0 of the General Information Portion (DOE/RL-91-28). Generally, the laws applicable to the LERF and the ETF include, but might not be limited to, the following:

Atomic Energy Act of 1954 Federal Facility Compliance Act of 1992 Clean Air Act of 1977 Safe Drinking Water Act of 1974 Emergency Planning and Community Right-to-Know Act of 1986 Toxic Substances Control Act of 1976 National Historic Preservation Act of 1966 Endangered Species Act of 1973 Fish and Wildlife Coordination Act of 1934 Federal Insecticide, Fungicide, and Rodenticide Act of 1975 Hazardous Materials Transportation Act of 1975 National Environmental Policy Act of 1969 Washington Clean Air Act of 1967 Washington Water Pollution Control Act of 1945 Washington Pesticide Control Act of 1971 New Source Construction Permits Model Toxics Control Act Benton Clean Air Authority Regulation 1 State Environmental Policy Act of 1971.

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14.0 PART B CERTIFICATION [K]

3 4 The following certification, required by WAC 173-303-810(13), for all applications and reports submitted to Ecology is hereby included: 5 6 I certify under penalty of law that this document and all attachments 7 were prepared under my direction or supervision in accordance with a system 8 designed to assure that qualified personnel properly gather and evaluate the 9 information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the 10 11 information, the information submitted is, to the best of my knowledge and 12 belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine 13 14 and imprisonment for knowing violations. 15 16 17 18 19 20 21 22 23 24 Date Owner/Operator 25 John D. Wagoner, Manager 26 U.S. Department of Energy, Richland Operations Office 27 28 29 30 31 32 33 Co-operator* Date J. Hatch. resident and Chief Executive Officer Fluor Daniel Hanford, Inc.

39 appendices.

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^{37 *} Fluor Daniel Hanford, Inc. is responsible for information presented in

³⁸ Chapters 1.0 through 4.0 and 6.0 through 15.0, including the associated

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14.0 PART B CERTIFICATION [K]

The following certification, required by WAC 173-303-810(13), for all applications and reports submitted to Ecology is hereby included:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner/Operator

John D. Wagoner, Manader U.S. Department of Energy, Richland Operations Office

Co-operator

W. J. Madia, Director Pacific Northwest National Laboratory

Date

36 * Pacific Northwest National Laboratory is responsible for information 37 presented in Chapter 5.0, including any associated appendices.

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TOPOGRAPHIC MAP

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APPENDIX 2A

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Topographic Map 200 Area Liquid Waste Processing Facilities, 242-A Evaporator, Liquid Effluent Retention Facility, Effluent Treatment Facility

APPENDIX 3A

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METRIC CONVERSION CHART

Into metric units

Int	co metric un				
		its	Out of metric units		
If you know	Multiply by	To get	If you know	Multiply by	To get
			Length		
		millimeters			inches
					inches
		meters	meters		feet
		meters	meters		yards
miles	1.609	kilometers	kilometers		miles
	Area		Area		
inches		centimeters	square centimeters		square inches
•		square meters	square meters		square feet
yards		square meters	square meters		square yards
miles		kilometers	kilometers		square miles
			hectares	2.471	acres
1			Mass (weight)		
ounces			grams		ounces
					pounds
short ton		metric ton	metric ton		short ton
			Volume		
ounces					fluid ounces
					quarts
					gallons
		meters	meters		cubic feet
cubic yards	0.76456	cubic meters	cubic meters	1.308	cubic vards
	Temperature		Temperature		
Fahrenheit	subtract 32 then multiply by 5/9ths	Celsius	Celsius	multiply by 9/5ths, then add 32	Fahrenheit
	Force		Force		
pounds per square inch	6.895	kilopascals	kilopascals	1.4504 x 10 ⁻⁴	pounds per square inch
	inches inches feet yards miles square inches square feet square feet square miles acres ounces pounds short ton fluid ounces quarts gallons cubic feet cubic yards Fahrenheit	If you know by Length inches 25.40 inches 2.54 feet 0.3048 yards 0.914 miles 1.609 Area square 6.4516 inches square square feet 0.092 square feet 0.092 square feet 0.404 mass (weight ounces 28.35 pounds 0.453 short ton 0.907 Volume fluid gallons 3.79 cubic feet 0.03 cubic yards 0.76456 Temperature Fahrenheit 32 then multiply by 5/9ths Force pounds per	It you knowbyTo getLengthinches25.40millimetersinches2.54centimetersfeet0.3048metersyards0.914metersmiles1.609kilometersAreasquare6.4516squareinchescentimeterssquare feet0.092squaremiles0.836squaresquare0.836squaremiles2.59squaremiles0.404hectaresacres0.404hectaresmounces28.35gramspounds0.453kilogramsshort ton0.907metric tonVolumefluid29.57quarts0.95litersgallons3.79literscubic feet0.03cubicmeterscubicmetersTemperatureFahrenheitSubtract22 then multiply by 5/9thsForcepounds per6.895kilopascals	If you knowbyIf you knowLengthinches25.40millimetersmillimetersinches2.54centimeterscentimetersfeet0.3048metersmetersmiles1.609kilometerskilometersmiles1.609kilometerskilometerssquare6.4516square centimeterssquare meterssquare feet0.092square meterssquare meterssquare0.836square meterssquare meterssquare2.59square squaresquare kilometerssquare2.59square meterssquare metersacres0.404hectareshectaresMass(weight)Mounces28.35grams gramspounds0.453kilogramskilogramsshort ton0.907metric ton metric tonmetric tonfluid ounces29.57millilitersmillersgallons3.79litersliterscubic feet0.03cubic meterscubic metersfahrenheitsubtract 32 then multiply by 5/9thsCelsiusCelsiusForcepounds per6.895kilopascalskilopascals	It you know by To get It you know by Length Length Length inches 25.40 millimeters 0.0393 feet 0.3048 meters meters 0.393 feet 0.3048 meters meters 3.2808 yards 0.914 meters meters 1.09 millimeters inches 3.2808 yards 0.914 meters meters 1.09 millimeters inches 0.62 Area Area square 6.4516 square o.62 Area square feet 0.092 square square 0.155 square feet 0.092 square square 10.7639 meters meters meters square 0.39 square 0.836 square square 0.39 milles acres 0.404 hectares 2.471 Mass (weight) Mass (weight) Mass (weight) Mass (weight) ounces 28.35 grams

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38 Source: Engineering Unit Conversions, M. R. Lindeburg, PE., Second Ed., 1990, Professional Publications, Inc., Belmont, California. 39

1.0 INTRODUCTION

In accordance with the federal and state regulations set forth in 40 Code of Federal Regulations (CFR) 264.13 and in Washington State Department of Ecology (Ecology) Dangerous Waste Regulations, Washington Administrative Code (WAC) 173-303-300, this waste analysis plan (WAP) has been prepared for operation of the Liquid Effluent Retention Facility (LERF) and the 200 Area Effluent Treatment Facility (ETF) located in the 200 East Area on the Hanford Site, Richland, Washington.

The purpose of this WAP is to document the sampling and analytical methods, and describe the procedures which are utilized for all dangerous wastes that are managed in the specific treatment storage, and disposal (TSD) units identified in the Part A, Form 3, permit application for the LERF and the ETF (DDE/RL-97-03). This WAP also documents the requirements for generators of aqueous wastes that will be sent to the LERF or ETF for treatment. Throughout this WAP, the term generator includes any Hanford Site unit, including TSD units, whose process produces an aqueous waste.

The TSD units include a surface impoundment (LERF) which provides treatment and storage, a tank system at the ETF which provides treatment and storage, and a container management area at the ETF which provides drum storage. Additionally, this WAP discusses the sampling and analytical methods the treated effluent (treated aqueous waste) that is discharged from the ETF as a non-dangerous, delisted waste to the State-Approved Land Disposal Site (SALDS). Specifically, the WAP delineates the following:

- <u>Influent Waste Acceptance Process</u> determines the acceptability of a
 particular aqueous waste at the LERF or ETF pursuant to applicable
 permit conditions, regulatory requirements, and operating capabilities
 prior to acceptance of the waste at the LERF or ETF for treatment or
 storage. See Section 2.0.
- <u>Special Management Requirements</u> identifies the special management requirements for aqueous wastes managed in the LERF or ETF. See Section 3.0.
- <u>Influent Aqueous Waste Sampling and Analysis</u> describes influent sampling and analyses used to characterize an influent aqueous waste to ensure proper management of the waste and for compliance with the special management requirements. Also includes rationale for analyses. See Section 4.0.
- <u>Treated Effluent Sampling and Analysis</u> describes sampling and analyses of treated effluent (i.e., treated aqueous waste) for compliance with State Waste Discharge Permit (Ecology 1995a) and Final Delisting [40 CFR 261, Appendix IX, Table 2 (EPA, 1995)] limits. Also includes rationale for analyses. See Section 5.0.
- <u>ETF Secondary Waste Sampling and Analysis</u> describes the sampling analyses used to characterize the secondary waste streams generated

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within the ETF and stored in drums. Also includes rationale for analyses. See Section 6.0.

 <u>Quality Assurance and Quality Control</u> – ensures the accuracy and precision of sampling and analysis activities. See Section 7.0.

This WAP is designed to meet the specific requirements of the following:

- Land Disposal Restrictions Treatment Exemption for the LERF under 40 CFR 268.4, U.S. Environmental Protection Agency, December 6, 1994 (Appendix C)
- Final Delisting for the ETF, 40 CFR 261, Appendix IX, Table 2 (EPA 1995)
- Washington State Waste Discharge Permit, No. ST 4500, as amended, (Ecology 1995a)
- Dangerous Waste Portion of the Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Hanford Facility Permit WA7890008967, September 28, 1994 (Ecology 1994).

This plan also was designed to include the specific elements of a WAP, as identified in the *Dangerous Waste Permit Application Requirements* (Ecology 1996a). Groundwater monitoring is addressed in separate plans. A copy of this WAP will be available at the ETF at all times.

30 Throughout this WAP, reference is made to radioactive waste. Although 31 the treatment and storage of radioactive waste (i.e., source, special nuclear, and by-product materials as defined by the Atomic Energy Act of 1954) are not 32 33 within the scope of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended or WAC 173-303, information is provided for general knowledge where 34 35 appropriate. Additionally, the conditions of the Washington State Discharge 36 Permit, No. ST 4500 (Discharge Permit) are included in this WAP for completeness, though they also are not within the scope of RCRA or 37 38 WAC 173-303. Therefore, revisions of this WAP that are not governed by the 39 requirements of WAC 173-303 will not be considered as a modification subject 40 to review or approval by Ecology.

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43 1.1 LIQUID EFFLUENT RETENTION FACILITY AND EFFLUENT TREATMENT FACILITY 44 DESCRIPTION 45

The LERF and ETF comprise an aqueous waste treatment system located in the 200 East Area (Figure 1-1). Both LERF and the ETF may receive aqueous waste through several inlets. The ETF generally receives aqueous waste directly from the LERF. However, aqueous waste also can be transferred from the Load-In Station to the ETF. The Load-In Station is located just east of the ETF and currently consists of two 37,854-liter storage tanks and a pipeline that connects to either LERF or the ETF through fiberglass pipelines with secondary containment.

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3 The LERF can receive access waste through four inlets. First, aqueous waste can be transferred to LERF through a pipeline from the 200 West Area. Second, aqueous waste can be transferred through a pipeline that connects LERF with the 242-A Evaporator. Third, aqueous waste also can be transferred to 6 7 LERF from a pipeline that connects LERF to the Load-In Station at the ETF. 8 Finally, aqueous waste can be transferred into LERF through a series of sample 9 ports located at each basin. 10

11 The LERF consists of three lined surface impoundments with a nominal 12 capacity of 24.6 million liters each. Aqueous waste from LERF is pumped to 13 the ETF through a double-walled fiberglass pipeline. The pipeline is equipped 14 with leak detection located in the annulus between the inner and outer pipes. 15 Each basin is equipped with six available sample risers constructed of 6-inch 16 perforated pipe. A seventh sample riser in each basin is dedicated to 17 influent waste receipt piping, and an eighth riser in each basin contains 18 liquid level instrumentation. Each riser extends along the sides of each 19 basin from the top to the bottom of the basin. Detailed information on the 20 construction and operation of the LERF is provided in Chapter 4.0 of the Hanford Facility Dangerous Waste Permit Application, Liquid Effluent Retention 21 22 Facility and 200 Area Effluent Treatment Facility (DOE/RL-97-03). 23

The ETF was designed to treat the contaminants anticipated in process condensate (PC) from the 242-A Evaporator and other aqueous wastes from the Hanford Site. Section 1.2 provides more information on the sources of these wastes.

29 The capabilities of the ETF were confirmed through pilot plant testing. 30 A pilot plant was used to test surrogate solutions that contained constituents 31 of concern anticipated in aqueous wastes on the Hanford Site. The pilot plant 32 testing served as the basis for a demonstration of the treatment capabilities 33 of the ETF in the 200 Area Effluent Treatment Facility Delisting Petition 34 (DOE/RL-92-72). The pilot plant test data also were used to establish that 35 the ETF provides 'best available treatment and all known, available, and 36 reasonable methods of treatment' (BAT/AKART), as required in the permitting of 37 the ETF under the state water quality and wastewater discharge permit 38 regulations (WAC 173-200 and WAC 173-216, respectively). 39

40 The ETF consists of a primary and a secondary treatment train 41 (Figure 1-2). The primary treatment train removes or destroys dangerous and 42 mixed waste components from the aqueous waste. In the secondary treatment train, the mixed waste components are concentrated and dried into a powder. 43 44 The powder waste is containerized, and transferred to a waste treatment, 45 storage, and/or disposal (TSD) unit.

Each treatment train consists of a series of operations. The primary treatment train includes the following:

- Surge tank
- Rough filter
- Ultraviolet light oxidation (UV/OX)

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- Hydrogen peroxide decomposer
- Fine filter
- Degasification
- Reverse osmosis (RO)
- Polisher [ion exchange (IX) column]
- Final pH adjustment and verification.

The secondary treatment train uses the following systems:

- Secondary waste receiving tanks
- Evaporator (mechanical vapor recompression)
- Concentrate tank
- Thin film drver
- Container handling
- Supporting systems.

18 A dry powder waste is generated from the secondary treatment train, from 19 the treatment of an aqueous waste. The secondary waste treatment system 20 typically receives and processes by-products generated from the primary 21 treatment train. However, in an alternate operating scenario, some aqueous 22 wastes may be fed to the secondary treatment train before the primary 23 treatment train. Detailed information on the treatment trains and the unit 24 operations is provided in Chapter 4.0 of the dangerous waste permit 25 application for the LERF and ETF (DOE/RL-97-03). 26

27 The treated effluent is contained in verification tanks where the 28 effluent is sampled and analyzed, and held until the analytical results 29 confirm that the effluent meets the 'delisting' criteria. Under 40 CFR 261. 30 Appendix IX, Table 2, the treated effluent from the ETF is considered a 31 delisted waste; that is, the treated effluent is no longer a dangerous or 32 hazardous waste subject to the hazardous waste management requirements of 33 RCRA. The treated effluent is discharged under the Discharge Permit as a nondangerous, delisted waste to the SALDS, located in the 600 Area, north of 34 35 the 200 West Area (Figure 1-1).

38 1.2 SOURCES OF AQUEOUS WASTE

The ETF was intended and designed to treat a variety of radioactive and/or aqueous mixed wastes. However, during the initial phases of developing the dangerous waste permit application for the LERF and ETF, PC from the 242-A Evaporator was the only mixed waste identified for storage and treatment in the LERF and the ETF. As cleanup activities at Hanford progress, many of the aqueous wastes generated from site remediation and waste management activities will be sent to the LERF and ETF for treatment and storage.

The PC is a dangerous waste because it is derived from a listed, dangerous waste stored in the Double-Shell Tank (DST) System and because of the ammonia content. The DST waste is transferred to the 242-A Evaporator where the waste is concentrated through an evaporation process. The concentrated slurry waste is returned to the DST System, and the evaporated portion of the waste is recondensed, collected, and transferred as PC to the LERF.

4 Other aqueous wastes that will be treated and stored at the LERF and ETF 5 include, but are not limited to the following Hanford wastes: contaminated 6 groundwater from pump-and-treat remediation activities such as groundwater 7 from the 200-UP-1 Operable Unit: water from deactivation activities such as 8 water from the spent fuel storage basins at deactivated reactors (e.g., 9 N Reactor); laboratory aqueous waste from unused samples and sample analyses; and leachate from landfills, such as the Environmental Restoration Disposal 10 11 Facility. 12

Most of these aqueous wastes will be accumulated in batches in a LERF basin for interim storage and treatment through pH and flow equalization before final treatment in the ETF. However, some aqueous wastes, such as 200-UP-1 Groundwater, may flow through LERF en route to the ETF for final treatment. The constituents in these aqueous wastes are common to the Hanford Site and were considered in pilot plant testing or in vendor tests, either as a constituent or as a family of constituents.

Some of the aqueous wastes could contain tritium, a radioactive isotope of hydrogen. Because there is no economically, viable treatment technology available to remove tritium, tritium is not reduced in the treated effluent discharged to the SALDS.

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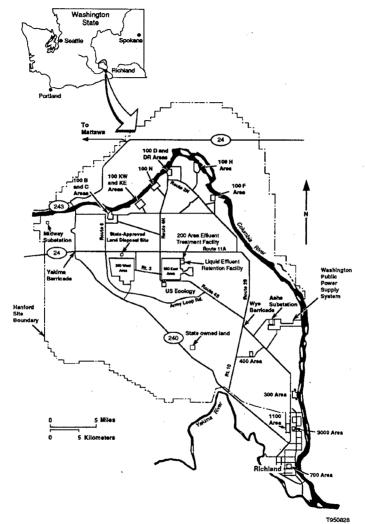


Figure 1-1. Location of the Liquid Effluent Retention Facility, the 200 Area Effluent Treatment Facility, and the State-Approved Land Disposal Site.

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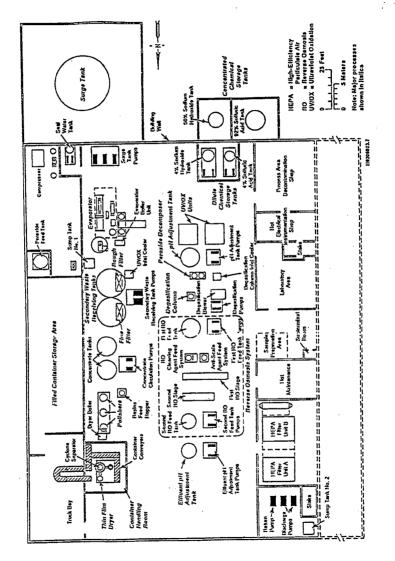


Figure 1-2. 200 Area Effluent Treatment Facility Floor Plan.

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2.0 INFLUENT WASTE ACCEPTANCE PROCESS

Throughout the acceptance process, there are certain criteria that must be met for an influent waste (i.e., aqueous waste) to be accepted. These criteria are identified in the following sections and summarized in Table 2-2. It should be noted that if an aqueous waste initially does not meet these criteria, it is not necessarily rejected. In many instances, the ETF process or the LERF and ETF permits can be modified to accommodate the treatment and storage of that waste. A discussion of the re-evaluation process is provided in Section 2.3.

The first step in the waste acceptance process is for the generator to provide information on the influent waste stream. At this stage, the generator will work with LERF/ETF personnel to define what information must be provided to determine the acceptability of an aqueous waste for the treatment, storage, or disposal at the LERF and the ETF. At a minimum, the information required by WAC 173-303-300(2) will be obtained, which includes sampling and analysis of the aqueous waste stream. The LERF/ETF management will evaluate, on a case-by-case basis, whether the aqueous waste stream is acceptable for storage and treatment. The waste acceptance process contains the following steps.

Acceptance Process is performed as follows.

- <u>Waste information</u>--the generator of an aqueous waste works with LERF/ETF personnel to provide detailed information on the waste stream, i.e., a waste characterization.
- <u>Waste management decision process</u>--LERF/ETF management decision is based on a case-by-case evaluation of whether an aqueous waste stream is acceptable for treatment or storage, or whether to reject a stream. In addition, any special management practices required for an accepted stream may be specified at this time. The evaluation is divided into two categories.
 - Regulatory acceptability--a review to determine if there are any
 regulatory concerns that would prohibit the storage or treatment of
 an aqueous waste in the LERF or ETF; e.g., treatment would meet
 permit conditions that would be in compliance with applicable
 regulations.
 - Operational acceptability--an evaluation to determine if there are any operational concerns that would prohibit the storage or treatment of an aqueous waste in the LERF or ETF; e.g., determine treatability and compatibility or safety considerations.

Specific waste acceptance criteria are defined within the individual discussions on regulatory and operational acceptability.

<u>Re-evaluation Process</u> is performed to ensure the characterization is accurate and current. This process also provides a mechanism for

re-evaluating an aqueous waste stream that does not meet the waste acceptance criteria.

<u>Record Information/Decision Process</u>--provides that information used in the decision, the evaluation, and the decision are documented as part of the ETF Operating Record.

2.1 ACCEPTANCE PROCESS

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11 When an aqueous waste stream is identified for treatment or storage in 12 the LERF or ETF, the generator is required to characterize the waste and 13 document the characterization on an aqueous waste profile sheet (WPS). This requirement is the first waste acceptance criterion. The LERF and the ETF 14 15 personnel work with the generators to ensure that the necessary information is 16 collected for the characterization of a waste stream (i.e., the appropriate 17 analyses or adequate process knowledge), and that the information provided on the WPS is complete. The completed WPS is maintained at the ETF. 18 19

21 2.1.1 Waste Characterization 22

Because the constituents in the individual aqueous waste streams vary, each stream is characterized and evaluated for acceptability on a case-by-case basis. The generator is required to designate an aqueous waste which generally will be backed up by analytical data. However, a generator may use process knowledge to substantiate the waste designation, or for general characterization information. Examples of acceptable process knowledge include the following:

- Documented data or information on processes similar to that which generated the aqueous waste stream
- Information/documentation that dangerous waste constituents are from specific, well documented processes, e.g., F-listed wastes
- Information/documentation that sampling/analyzing a waste stream would pose health and safety risks to personnel
- Information/documentation that the waste does not lend itself to collecting a laboratory sample.

43 When a generator submits process knowledge for the characterization of a 44 dangerous and/or mixed waste stream, the process knowledge is reviewed by LERF 45 and ETF personnel as part of the waste acceptance process. Specifically, LERF and ETF personnel review the generator's processes to verify the integrity of 46 47 the process knowledge, and determine whether the process knowledge is current 48 and consistent with current regulations. The final decision on the adequacy of the process knowledge is determined by LERF/ETF management or their 49 50 designee. The persons reviewing generator process knowledge and those making decisions on the adequacy of process knowledge are trained according to the 51 requirements of the Dangerous Waste Training Plan [Chapter 8.0 of the 52

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dangerous waste permit application for the LERF and ETF (DOE/RL-97-03)].

The generator is also responsible for identifying those Land Disposal Restrictions (LDR) that would be applicable to the influent aqueous waste as part of the characterization, as require under 40 CFR 268.40 and WAC 173-303-140. Because the ETF is a Clean Water Act - equivalent TSD unit (40 CFR 268.37(a)), the generator is not required to identify the underlying hazardous constituents (40 CFR 286.48).

10 When analyzing an aqueous waste stream for characterization, a generator 11 is required to use the target list of parameters identified in Table 4-112 (Section 4.0). The corresponding analytical methods are provided in 13 Appendix B. The generator may use process knowledge in lieu of some analyses, 14 as determined by LERF/ETF management or their designee, if the process 15 knowledge is adequate (as described above). For example, if a generator 16 provides information that the process generating an aqueous waste does not 17 include or involve organic chemicals, analyses for organic compounds likely 18 would not be required. Additional analyses could be required if historical 19 information and/or process knowledge indicate that an aqueous waste contains 20 constituents not included in the target list of parameters. 21

The LERF and ETF personnel will work with the generator to determine which analyses are appropriate for the characterization. This approach ensures that the waste analyses adequately characterize the aqueous waste and defines the constituents of concern in a cost effective manner. The characterization and historical information are documented in the WPS, which is discussed in the following section.

2.1.2 Aqueous Waste Profile Sheet

32 The WPS documents the characterization of each new aqueous waste stream. 33 The profile includes a detailed description of the volume, source, regulatory 34 history, and the chemical and physical nature of the aqueous waste. For an 35 aqueous waste to be accepted for treatment or storage in the LERF or the ETF. 36 each new waste stream generator is required to complete and provide this form 37 to LERF and ETF. Each generator also is required to provide the analytical 38 data and process knowledge used to designate the agueous waste stream, and to 39 determine the chemical and physical nature of the waste. An example of a typical WPS is provided in Appendix A. This form could be modified to 40 41 accommodate changes in regulations, operational concerns at the LERF or ETF. 42 Hanford Facility needs, or other needs. However, the basic elements of the example form (e.g., waste source information) will be maintained in any future 43 44 revision. 45

The LERF and the ETF management determine whether the information on the WPS is sufficient. The LERF and ETF management use this information to evaluate the acceptability of the aqueous waste for storage and treatment in the LERF and the ETF, and to determine if the aqueous waste can be handled properly.

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1 2.2 WASTE MANAGEMENT DECISION PROCESS

3 All aqueous waste under consideration for acceptance must be 4 characterized using analytical data and process knowledge. This information 5 is used to determine the acceptability of an aqueous waste stream. The LERF 6 and ETF Facility Manager or their designee is responsible for making the 7 decision to accept or reject an aqueous waste stream. The management decision 8 to accept any aqueous waste stream is based on an evaluation of regulatory acceptability and operational acceptability. Each evaluation uses acceptance 9 10 criteria, which were developed to ensure that an aqueous waste is managed in a 11 safe, environmentally sound and compliant manner. The following sections 12 provide detail on the acceptance evaluation and the acceptance criteria. 13

In many instances, an aqueous waste that does not meet one of the waste acceptance criteria is not necessarily rejected. Section 2.3 discusses the process for re-evaluating an aqueous waste that does not initially meet the waste acceptance criteria. However, the final decision to reject an aqueous waste is made by LERF and ETF management. An aqueous waste stream could be rejected for one of the following reasons:

- The paperwork and/or laboratory analyses from the generator are insufficient
- Discrepancies with the regulatory and operational acceptance criteria cannot be reconciled, including:
 - An aqueous waste is not allowed under the current Discharge Permit or Final Delisting, and LERF/ETF management elect not pursue an amendment, or the permit and Delisting cannot be amended (Section 2.2.1)
 - An aqueous waste is incompatible with LERF liner materials or with other aqueous waste in LERF and no other management method is available (2.2.2).
- Adequate storage or treatment capacity is not available.

39 2.2.1 Regulatory Acceptability

41 Each aqueous waste stream is evaluated on a case-by-case basis to 42 determine if there is any regulatory concerns that would preclude the storage 43 or treatment of a waste in the LERF or the ETF. Before an aqueous waste can 44 be treated in either the LERF of the ETF, the regulatory history must be 45 determined. Information on the regulatory history of an agueous waste is documented in the WPS. This information is used to confirm that treating or 46 storing the aqueous waste in the LERF or the ETF is allowed under and in 47 compliance with WAC 173-303, dangerous waste permit application for the LERF 48 and ETF, the Final Delisting for the ETF, and the Discharge Permit for the 49 50 ETF. 51

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2.2.1.1 Dangerous Waste Regulations/Permits. Before an aqueous waste stream is sent to the LERF or the ETF, the generator will characterize and designate the stream with the appropriate dangerous/hazardous waste numbers according to WAC 173-303-070. The Part A, Form 3, permit applications for the LERF and the ETF. and the Final Delisting for the ETF identify the specific waste numbers for dangerous/mixed waste that can be managed in the LERF and the ETF. Dangerous waste designated with waste numbers not specified in the Part A. 8 Form 3, permit applications can not be treated or stored in the LERF or the 9 ETF, until the Part A, Form 3, permit application is modified. 10

11 Additionally, aqueous wastes designated with listed waste numbers 12 identified in the Final Delisting will be managed in accordance with the 13 conditions of the delisting, or an amended delisting. Accordingly, the 14 acceptance criteria in this evaluation are satisfied through compliance with 15 the Part A, Form 3, permit applications and the Final Delisting. 16

17 2.2.1.2 State Waste Permit Regulations/Permit. Compliance with the Discharge Permit constitutes another waste acceptance criterion. In accordance with the 18 conditions of the Discharge Permit, the constituents of concern in each new 19 aqueous waste stream must be identified. The regulatory history and 20 21 characterization data provided by the generator are used to identify these 22 constituents. A constituent of concern, under the conditions of the Discharge 23 Permit, in an aqueous waste stream is defined as any contaminant with a 24 maximum concentration greater than one of the following: 25

- Any limit in the Discharge Permit (Ecology 1995a)
- Groundwater Quality Criteria (WAC 173-200)
- Final Delisting levels (EPA 1995)
- Background groundwater concentrations as measured at the ETF disposal site.

The conditions of the Discharge Permit also require a demonstration that the ETF can treat the constituents of concern to below discharge limits.

2.2.2 Operational Acceptability

41 Because the operating configuration or operating parameters at the LERF and ETF can be adjusted or modified, most aqueous waste streams generated on 42 the Hanford Site can be effectively treated to below Delisting and Discharge 43 44 Permit limits. Because of this flexibility, it would be impractical to define numerical acceptance or decision limits. Such limits would constrain the 45 acceptance of appropriate aqueous waste streams for treatment at the LERF and 46 ETF. The versatility of the LERF and ETF is better explained in the following 47 48 examples: 49

 The typical operating configuration of the ETF is to process an aqueous waste through the UV/OX unit first, followed by the RO unit. However, high concentrations of nitrates may interfere with the

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performance of the UV/OX. In this case, the ETF could be configured to process the waste in the RO unit prior to the UV/OX unit.

• For a small volume aqueous waste with high concentrations of some anions and metals, the approach may be to first process the waste stream in the secondary treatment train. This approach would prevent premature fouling or scaling of the RO unit. The liquid portion (i.e., untreated overheads from the ETF evaporator and thin-film dryer) would be send to the primary treatment train.

- An aqueous waste with high concentrations of chlorides and fluorides may cause corrosion problems when concentrated in the secondary treatment train. One approach is to adjust the corrosion control measures in the secondary treatment train. An alternative may be to blend this aqueous waste in a LERF basin with another aqueous waste which has sufficient dissolved solids, such that the concentration of the chlorides in the secondary treatment train would not pose a corrosion concern.
- Some metal salts (e.g., barium sulfate) tend to scale the RO membranes. In this situation, descalants used in the treatment process may be increased.
- Any effluent that does not meet these limits in one pass through the ETF treatment process is recycled to the ETF for re-processing.

There are, however, some aqueous wastes whose chemical and physical properties would preclude that waste from being treated or stored at the LERF or ETF. Accordingly, an aqueous waste is evaluated to determine if it is treatable, if it would impair the efficiency or integrity of the LERF or ETF, and if it is compatible with materials in these units. This evaluation also determines if the aqueous waste is compatible with other aqueous wastes(s) managed in the LERF.

35 The waste acceptance criteria in this category focus on determining 36 treatability of an aqueous waste stream, and on determining any operational 37 concerns that would prohibit the storage or treatment of an aqueous waste 38 stream in the LERF or the ETF. The chemical and physical properties of an 39 aqueous waste stream are determined as part of the waste characterization, and are documented on the WPS and compared to the design of the units to determine 40 41 whether an aqueous waste stream is appropriate for storage and treatment in 42 the LERF and the ETF.

44 **2.2.2.1 Treatability.** The process of determining treatability involves two steps. The first step is to establish the treatment efficiencies for the 45 constituents of concern in an influent aqueous waste. The treatment 46 47 efficiencies must be sufficient such that the treated effluent will meet the Discharge Permit and Delisting limits. The pilot plant testing provided 48 49 destruction and removal (i.e., treatment) efficiencies for most of the anticipated constituents in aqueous waste streams at the Hanford Site, and are 50 51 documented in the 200 Area Effluent Treatment Facility Delisting Petition 52 (DOE/RL-92-72). Information or studies from the vendors of the individual

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treatment units studies may also be used on a case-by-case basis to develop treatment efficiencies for the ETF or for the individual treatment units. [Chapter 4.0 of the dangerous waste permit application for the LERF and ETF (DOE/RL-97-03) provides a detailed discussion of the individual treatment units.] Treatment efficiencies also may be determined or confirmed by ETF operating data.

The second step in determining treatability is to identify those physical and chemical properties in an aqueous waste that would interfere with, or foul the ETF treatment process. This step focuses on the potential of a waste stream to interfere with the destruction efficiency of organic compounds in the UV/OX system, rejection rates of the RO membranes, or foul the filtration systems. Generally, the operating parameters or operating configuration at the LERF or ETF can be adjusted or modified to accommodate these properties. However, in those cases where a treatment process or operating configuration cannot be modified, the aqueous waste stream will be excluded from treatment or storage at the LERF or ETF. 18

Additionally, an aqueous waste stream is evaluated for the potential to deposit solids in a LERF basin (i.e., an aqueous waste which contains sludge). This evaluation will also consider the whether blending or mixing two or more aqueous waste streams will result in the formation of a precipitate. However, because the waste streams managed in the LERF and ETF are generally dilute. the potential for mixing waste streams an forming a precipitate is low, no specific compatibility tests are performed. If necessary, filtration at the waste source could be required before acceptance into LERF.

28 To determine if an aqueous waste meets the criterion of treatability. 29 specific information is required. Treatment efficiencies will be developed 30 from characterization data provided by the generator. Generators will also 31 provide characterization data to identify those physical and chemical 32 properties that would interfere with, or foul the ETF treatment process. In 33 some instances, process knowledge may be adequate to identify a chemical or 34 physical property that would be of concern. For example, the generator could provide process knowledge that the stream has two phases (an oily phase and an 35 36 aqueous phase). In this case, if the generator could not physically separate 37 the two phases, the aqueous waste stream would be rejected because the oily 38 phase could compromise some of the treatment equipment. Typically, analyses for the following parameters are required to evaluate treatability and 39 40 operational concerns: 41

- total dissolved solids
- specific conductivity

- total organic carbon
- total suspended solids
- pH.

- 46 Data also are needed on what are typically the major components of an 47 aqueous waste. These include calcium, magnesium, sodium, potassium, silica, 48 barjum, iron, nitrate, chloride, and sulfate. Finally, the following constituents also could affect the treatability of an aqueous waste and may be 49 50 considered in the characterization: aluminum, manganese, phosphate, and bromide. These constituents are identified in Table 2-2. 51 52

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2.2.2.2 Compatibility with Liquid Effluent Retention Facility Liner and
 Piping. As part of the acceptance process, the criteria of compatibility with
 the LERF liner materials is evaluated for each aqueous waste stream. The
 evaluation for liner compatibility is documented as part of the waste
 acceptance process. The chemical parameters or constituents considered for
 liner compatibility are identified in Table 2-1. The analytical methods for
 these parameters and constituents are provided in Appendix B.

9 The high-density polyethylene liners in the LERF basins potentially are 10 vulnerable to the presence of certain constituents that might be present in 11 some aqueous waste. Using EPA Method 9090 (EPA 1996), the liner materials 12 were tested to evaluate compatibility between aqueous waste stored in the 13 LERF and synthetic liner components. Based on the data from the compatibility 14 test and vendor data on the liner materials, several constituents and 15 parameters were identified as potentially harmful (at high concentrations) to the integrity of the liners. From these data and the application of safety 16 17 factors, concentration limits in Table 2-1 were established.

Except for PC, the strategy for protecting the integrity of a LERF liner is to establish upfront that an aqueous waste is compatible before the waste is accepted into LERF. Characterization data on each new aqueous waste stream are compared to the limits outlined in Table 2-1 to ensure compatibility with the LERF liner material before acceptance into the LERF.

25 PC from each 242-A Evaporator campaign is sampled and analyzed, and the 26 results compared to the limits in Table 2-1 to ensure continued compatibility 27 with the liner. Additionally, before a waste stream is processed at the 28 242-A Evaporator, DST analytical data are reviewed and administrative and 29 process controls developed and implemented to ensure that PC is compatible 30 with the LERF liner. For flow-through aqueous wastes like the 31 200-UP-1 Groundwater, characterization data will be reviewed quarterly to ensure that liner compatibility is maintained. 32 33

In some instances, process knowledge may be adequate to determine that an aqueous waste is compatible with the LERF liner. In those instances where process knowledge is adequate, the waste characterization would likely not require analysis for these parameters and constituents.

39 2.2.2.3 Compatibility with Other Waste. Some aqueous wastes, especially small volumes, are accumulated in the LERF with other aqueous waste. Before 40 41 acceptance into the LERF, the aqueous waste stream is evaluated for its 42 compatibility with the resident aqueous waste(s). The evaluation focuses on 43 the potential for an aqueous waste to react with another waste (40 CFR 264, 44 Appendix V, "Examples of Potentially Incompatible Wastes"). Though the 45 potential for problems associated with commingling aqueous wastes is very low. 46 this evaluation confirms the compatibility of two or more aqueous wastes from 47 different sources. No specific analytical test for compatibility is 48 performed. 49

50 If it is determined that an aqueous waste stream is incompatible with 51 other aqueous waste streams, alternate management scenarios are available. 52 For example, another LERF basin that contains a compatible aqueous waste(s)

might be used, or the agueous waste stream might be fed directly into the ETF for treatment. In any case, potentially incompatible waste streams are not mixed, and all aqueous waste is managed in a way that precludes a reaction, degradation of the liner, or interference with the ETF treatment process.

2.3 RE-EVALUATION PROCESS

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In accordance with 40 CFR 264.13 and WAC 173-303-300(4)(a), an influent aqueous waste will be re-evaluated as necessary to ensure that the characterization is accurate and current. At a minimum, an aqueous waste stream will be re-evaluated in the following situations.

- The LERF and the ETF management has been notified, or has reason to believe that the process generating the waste has changed.
- The LERF and the ETF management notes a increase or decrease in the . concentration of a constituent in an aqueous waste stream, beyond the range of concentrations that was described or predicted in the waste characterization.

In these situations, LERF and ETF management will review the available information. If existing analytical information is not sufficient, the generator may be asked to review and update the current waste characterization, to supply a new WPS, or re-sample and re-analyze the aqueous waste, as necessary. Other situations that might require a re-evaluation of a waste stream are discussed in the following sections.

2.3.1 Re-Evaluation for Aqueous Wastes not Meeting Waste Acceptance Criteria

32 An aqueous waste that does not meet one of the acceptance criteria is not necessarily rejected. Several options are available in the event that an 34 aqueous waste is not acceptable following an initial evaluation. For example, a more extensive evaluation could be required to determine if the ETF process can be modified to treat an aqueous waste to required discharge levels. Additionally, a more extensive evaluation might be required to determine if a modification of the Discharge Permit or the Final Delisting is required and is feasible (e.g., to treat waste with new listed waste numbers).

2.3.2 Re-Evaluation for Treated Effluent not Meeting 200 Area Effluent Treatment Facility Permit Limits

45 If the treated effluent does not meet the Discharge Permit and Delisting limits in one pass through the ETF treatment process, the acceptability of the 46 influent aqueous waste would be re-evaluated. This situation generally would apply to large volumes of aqueous waste (such as 200-UP-1 Groundwater) or to 47 48 aqueous waste that is sent to the LERF or the ETF in batches on some frequency 49 (such as monthly transfers of an aqueous waste). Small volumes of aqueous 50 waste generally would be reprocessed until permit limits are met. 51 52

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2.3.3 Re-Evaluation Requirements for Flow-Through Aqueous Waste

Aqueous waste like the 200-UP-1 Groundwater is unique because of the constant-flow source, and because the waste is pumped into a LERF basin throughout the lifetime of the pump-and-treat remediation activity. Also, rather than being accumulated in the LERF in a batch mode, this aqueous waste will generally flow through the LERF to the ETF for final treatment. Though this aqueous waste has been characterized upfront for acceptability, special 9 sampling and analysis requirements must be met during the pump-and-treat 10 operation to ensure that it continues to meet acceptance criteria.

12 Accordingly, flow-through wastes like the 200-UP-1 Groundwater are, and 13 will be sampled quarterly to update the initial characterization. This 14 on-going characterization is monitored by the LERF and the ETF personnel. If 15 the data from a sampling event suggest that contaminant concentrations have 16 increased beyond that described in the initial characterization, the 17 acceptability of the waste stream will be re-evaluated. Details on the 18 sampling and analysis of flow-through aqueous waste, like the 200-UP-1 19 Groundwater, are provided in Section 4.0. 20

22 2.4 RECORD/INFORMATION AND DECISION 23

24 The information and data collected throughout the acceptance process, and 25 the evaluation and decision on whether to accept an influent aqueous waste 26 stream for treatment or storage in the LERF or the ETF are documented as part 27 of the ETF Operating Record, which is maintained at the ETF. Specifically, 28 the Operating Record contains the following components on a new influent 29 aqueous waste stream: 30

The signed WPS for each agueous waste stream and analytical data

- Process knowledge used to characterize a dangerous/mixed waste (under WAC 173-303), and information supporting the adequacy of the process knowledge
- The evaluation on whether an aqueous waste stream meets the waste acceptance criteria, including:
 - The evaluation for regulatory acceptability including appropriate regulator approvals
 - the evaluation for liner compatibility and for compatibility with other aqueous waste.

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Chemical Family	Constituent(s) or Parameter(s)*	Limit (mg/L) ^b (sum of constituen concentrations)		
Alcohol/glycol	benzyl alcohol, 1-butanol	500,000		
Alkanone	acetone, 2-hexanone, methyl ethyl ketone, methyl isobutyl ketone, and 2-pentanone	200,000		
Alkenone	none targeted	NA		
Aromatic/cyclic hydrocarbon	acetophenone, benzene, chlorobenzene, cresol, 2000 1,4-dichlorobenzene, 2,4-dinitrotoluene, di-n-octyl phthalate, naphthalene, tetrahydrofuran, toluene, xylene			
Halogenated hydrocarbon	carbon tetrachloride, chloroform, 1,2-dichloroethane, 20 1,2-dichloroethene, 1,1-dichloroethylene, methylene chloride, tetrachloroethylene, 1,1,1-trichloroethane, 1,1,2-trichloroethane, trichloroethylene, vinyl chloride			
Aliphatic hydrocarbon	hexachloroethane	500,000		
Ether	2-butoxyethanol	2000		
Other hydrocarbons	dimethylnitrosamine, tributyl phosphate	2000		
Oxidizers	none targeted	NA		
Acids, Bases, Salts	ammonium	100,000		
нq	Ha	0.5 < pH < 13.0		

Table 2-1. General Limits for Liner Compatibility.

^a Analytical methods for the parameters and constituents are provided in Appendix B.

^b Analytical data for a chemical family (as indicated) are summed using the following 'sum of the fraction technique'. The individual constituent concentration, sum concentration (for families), and pH values for a waste stream are then evaluated against the compatibility limit.

$$\sum_{n=1}^{i} (\frac{\text{Conc}_n}{\text{LIMIT}_n}) \leq 1$$

where i is the number of organic constituents detected

^c Ketone containing saturated alkyl group(s).

^d Ketone containing unsaturated alkyl group(s).

mg/L = milligrams per liter.

Table 2-2. Waste Acceptance Criteria.

	Table 2-2. Waste Acceptance Criteria.		
General criteria category	Criteria description		
1. Characterization	A. Each generator must provide an aqueous waste profile.		
	B. Each generator must designate the aqueous waste stream.		
	C. Each generator must provide analytical data and/or process knowledge.		
2. Regulatory acceptability	A. The LERF and ETF can store and treat influent aqueous wastes with waste numbers identified in the Part A, Form 3, permit applications for the LERF and the ETF, and the Final Delisting for the ETF.		
	B. The aqueous waste must in compliance with conditions of the Discharge Permit.		
3. Operational acceptability	 A. Determine whether an aqueous waste stream is treatable, considering: Whether the removal and destruction efficiencies on the constituents of concern will be adequate to meet Discharge Permit and Delisting levels. Other treatability concerns; analyses for this evaluation may include: total dissolved solids silica total organic carbon potassium total suspended solids sodium specific conductivity barium calcium nitrate magnesium chloride manganese phosphate 		
	 B. Determine whether an aqueous waste stream is compatible, considering: 1. Whether an aqueous waste stream is compatible with LERF liner materials, compare characterization data to the liner compatibility limits (Table 2-1). 2. Whether an aqueous waste stream is compatible with other aqueous waste(s). (A 40 CFR 264 Appendix V type of comparison will be employed). 		

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3.0 SPECIAL MANAGEMENT REQUIREMENTS

Special management requirements for aqueous wastes that are managed in the LERF or ETF are discussed in the following sections.

3.1 MONITORING THE VARIABILITY OF PROCESS CONDENSATE

The Discharge Permit (Ecology 1995a, Section S5) requires sampling of PC in the LERF basins until sufficient data are collected to adequately assess the variability of ammonia and total Kjeldahl nitrogen (TKN), strontium-90, and iodine-129. The PC will be analyzed for these parameters to assess the range of concentrations present in the PC and the results reported to Ecology. In addition, the 10 highest concentrations of tentatively identified compounds (TICs) will be reported from each PC sampling event, as required by the discharge permit. Tentatively identified compounds are non-targeted organic compounds or fragments of compounds with unique chromatographic spectra that are qualitatively identified by comparing them to standard databases of spectra. Because these compounds are identified qualitatively, their concentration only can be estimated.

Reports have been submitted to Ecology that included the results of ammonia and TKN analysis, detections of strontium-90 and iodine-129, and the 10 highest TICs. The data in these reports suggested that there is very little variability in the PC.

3.2 CONDITIONS ON PROCESS CONDENSATE FOR NEWLY IDENTIFIED WASTE NUMBERS

31 In January 1995, the U.S. Department of Energy, Richland Operations 32 Office (DOE-RL) notified Ecology and the U.S. Environmental Protection Agency 33 that small amounts of listed waste might have been introduced to the DST System, upstream of the LERF and the ĚTF. This listed waste previously had 34 35 not been identified in the Dangerous Waste Part A, Form 3, permit applications 36 for the DST System, LERF, or ETF. In a March 7, 1995 letter from Ecology to 37 DOE-RL (Ecology 1995b), Ecology exercised its enforcement discretion with 38 respect to the designation of this waste so long as several conditions are 39 met. As long as these conditions are met, the waste numbers will not be included in the Part A, Form 3s, for the LERF or the ETF. These conditions 40 41 only apply to PC. The constituents vanadium, formate, and cyanide will be 42 analyzed in the PC to meet these conditions. 43

3.3 LAND DISPOSAL RESTRICTION COMPLIANCE AT LIQUID EFFLUENT RETENTION FACILITY

Because LERF provides treatment through flow and pH equalization, a surface impoundment treatment exemption from the land disposal restrictions was granted in accordance with 40 CFR 268.4 (EPA 1994 and Ecology 1996b). This treatment exemption is subject to several conditions, including a requirement that the WAP address the sampling and analysis of the treatment

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¹ 'residue' [40 CFR 268.4(a)(2)(i) and WAC 173-303-300(5)(h)(i) and (ii)] to ensure it meets applicable treatment standards. Though the term 'residue' is not specifically defined, this condition further requires that sampling must be designed to represent the "sludge and the supernatant" indicating that a residue may have a sludge (solid) and supernatant (liquid) component.

Solid residue is not anticipated to accumulate in a LERF basin for the following reasons:

- Aqueous waste streams containing sludge would not be accepted into LERF under the acceptance criteria of treatability (Section 2.2.2.1)
- No solid residue was reported from PC discharged to LERF in 1995
- The LERF basins are covered and all incoming air first passes through a breather filter
- No precipitating or flocculating chemicals are used in flow and pH equalization.

21 Therefore, the residue component subject to this condition is the 22 supernatant (liquid component). As indicated above, solids are not anticipated to accumulate in a LERF basin. Additionally, an aqueous waste 23 stream is evaluated for the potential to deposit solids in a LERF basin (i.e., an aqueous waste which contains sludge). If necessary, filtration at the 24 25 waste source could be required before acceptance into LERF. The contingency 26 27 for removal of solids will be addressed during closure [as indicated in the 28 Closure Plan, Chapter 11.0 of the dangerous waste permit application for LERF 29 and ETF (DOE/RL-97-03)]. 30

31 The conditions of the treatment exemption also require that treatment 32 residues (i.e., aqueous wastes) which do not meet the LDR treatment standards 33 "must be removed at least annually" [40 CFR 268.4(a)(2)(ii)]. To address the conditions of this exemption, an influent aqueous waste is sampled and 34 35 analyzed and the LDR status of the aqueous waste is established as part of the 36 acceptance process. The LERF basins are then managed such that any aqueous 37 waste(s) which exceeds an LDR standard is removed annually from a LERF basin, except for a heel of approximately 1 meter. A heel is required to stabilize 38 the LERF liner. The volume of the heel is approximately 1.9 million liters. 39 40

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4.0 INFLUENT AQUEOUS WASTE SAMPLING AND ANALYSIS

The following sections provide a summary of the sampling procedures, frequencies, and analytical parameters that will be used in the characterization of influent aqueous waste (Section 2.0) and in support of the special management requirements for aqueous waste in the LERF (Section 3.0).

4.1 SAMPLING PROCEDURES

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With a few exceptions, generators are responsible for the 13 characterization, including sampling and analysis, of an influent aqueous waste. PC is either sampled at the 242-A Evaporator or accumulated in a LERF 14 15 basin following a 242-A Evaporator campaign and sampled. Flow-through agueous 16 wastes, such as the 200-UP-1 Groundwater, will be characterized before acceptance; however, these aqueous wastes will also be sampled at LERF 17 18 quarterly. Other exceptions will be handled on a case-by-case basis. The 19 following section discusses the sampling locations, methodologies, and 20 frequencies for these aqueous wastes. Aqueous waste generators are referred to WAC 173-303-110(2) (40 CFR 261, Appendix I) for the sampling procedures that are applicable to their waste. For samples collected at the LERF and ETF, specific sampling protocol is followed. The sample containers, 22 23 24 preservation materials, and holding times for each analysis are listed in Appendix B.

4.1.1 Batch Samples

30 In those cases where PC is sampled in a LERF basin, samples are collected from four of the six available sample risers located in each basin, i.e., four 31 32 separate samples. Though there are eight sample risers at each basin, one is 33 dedicated to liquid level instrumentation and the other is dedicated as an influent port. Operating experience indicates that four samples adequately 34 capture the variability of an aqueous waste stream. Specifically, sections of 35 36 stainless steel tubing are inserted into the sample riser to an appropriate 37 depth. Using a portable pump, the sample line is flushed with the aqueous waste and the sample collected. The sample containers are filled for volatile 38 39 organic compounds (VOC) first, then semivolatile organic compounds (SVOC), and 40 then the remainder of the bottles in any order. 41

42 Several sample ports are also located at the ETF, including a valve on 43 the recirculation line at the ETF surge tank, and a sample valve on a tank discharge pump line at the ETF Load-In Station. All samples are obtained at 44 45 the LERF or ETF are collected in a manner consistent with SW-846 procedures 46 (EPA 1986). 47

4.1.2 Flow-Through Samples at the Liquid Effluent Retention Facility

Flow-through samples are collected from a valve located at a transfer pipeline connection to the LERF. Samples of flow-through aqueous wastes, such

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as 200-UP-1 Groundwater, are collected quarterly or more frequently if there is change in the source (e.g., a change in the well-head), or if it is determined that there is an increase in the concentration of contaminants beyond the range described in the initial characterization. For flow-through samples, VOC sample containers are filled first, followed by containers for SVOC samples, and containers for the remainder of other parameters.

4.2 ANALYTICAL RATIONALE

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11 As stated previously, each generator is responsible for designating and 12 characterizing an aqueous waste stream. Accordingly, each generator samples and analyzes an influent waste stream from the target list of parameters 13 14 (Table 4-1) for the waste acceptance process. At the discretion of the LERF 15 and ETF management, a generator may provide process knowledge in lieu of some analyses as discussed in Section 2.1.1. The LERF and ETF personnel will work 16 17 with the generator to determine which parameters are appropriate for the 18 characterization. 19

20 The analytical methods for these parameters are provided in Appendix B. 21 All methods for nonradioactive parameters are EPA methods. Additional 22 analyses may be required if historical information and process knowledge 23 indicate that an influent aqueous waste contains constituents not included in 24 the target list of parameters. For example, if process knowledge indicates 25 that an aqueous waste contains a parameter that is regulated by the 26 Groundwater Quality Criteria (WAC 173-200), that parameter(s) would be added 27 to the suite of analyses required for that aqueous waste stream.

The analytical data for the parameters presented in Table 4-1, including VOC, SVOC, metals, anions, general chemistry parameters, and radionuclides are used to define the physical and chemical properties of the aqueous waste to: 22

- Set operating conditions in the LERF and ETF (e.g., to determine operating configuration - refer to Section 2.2.2)
- Identify concentrations of some constituents which may also interfere with, or foul the ETF treatment process (e.g., fouling of the RO membranes refer to Section 2.2.2)
- Evaluate LERF liner and piping material compatibility
- Determine treatability to evaluate if applicable constituents in the treated effluent will meet Discharge Permit and Delisting limits
- Estimate concentrations of some constituents in the waste generated in the secondary treatment train (i.e., dry powder waste).

48 Some analyses also are required to address special conditions 49 (Section 3.0) or for other specific purposes as indicated below: 50

 <u>Formate analysis</u> is required for compliance with special conditions for PC (refer to Section 3.2).

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- <u>Total Kjeldahl nitrogen (TKN) analysis</u> required under the Discharge Permit to meet special conditions for PC (until discharge permit is modified, refer to Section 3.1).
- <u>Total dissolved solids analysis</u> to predict volume of powder waste from the secondary treatment train.
- <u>Radionuclide analyses</u> are used for inventorying radionuclides as necessary to demonstrate compliance with U.S. Department of Energy Orders (including DOE Orders 5480.5 and 5480.23) and monitoring for some radionuclides required for compliance with Discharge Permit.

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Table 4-1. Target Parameters for Influent Aqueous Waste Analyses. (sheet 1 of 2)

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	VOLATILE ORGANIC COMPOUNDS	SEMIVOLATILE ORGANIC COMPOUNDS
	Acetone	Acetophenone
	Benzene	Benzyl alcohol
	1-Butyl alcohol (1-Butanol)	2-Butoxyethanol
	Carbon tetrachloride	Cresol (o, p, m)
	Chlorobenzene	1,4-Dichlorobenzene
	Chloroform	Dimethylnitrosamine
	1,2-Dichloroethane (total)	Di-n-octyl phthalate
	1,1-Dichloroethylene	Hexachloroethane
	2-Hexanone	Naphthalene
	Methyl ethyl ketone (2-Butanone)	Tributy] phosphate
	Methyl isobutyl ketone (Hexone,	
	4-Methyl-2-pentanone)	
	2-Pentanone	
	Tetrachloroethylene	
	Tetrahydrofuran	
	Toluene	
	1,1,1-Trichloroethane	
	1,1,2-Trichloroethane	
	Trichloroethylene	
	Vinyl chloride	
	TOTAL METALS	RADIONUCLIDES
	Aluminum	Gross alpha
	Antimony	Gross beta
	Arsenic	Americium-241
	Barium	Antimony-125
)	Beryllium	Carbon-14
	Cadmium	Cerium/Praseodymium-144
	Calcium	Cesium-134
	Chromium	Cesium-137
	Copper	Cobalt-60
	Iron	Curium-242
	Lead	Curium-244
	Magnesium	Europium-152
	Manganese	Europium-154
	Mercury	Europium-155
)	Nickel	Iodine-129
	Potassium	Neptunium-237
,	Selenium	Niobium-94
	Silicon	Plutonium-238
	Silver	Plutonium-239/240
	Sodium	Radium-226
5	Uranium	Ruthenium-103
,	Vanadium	Ruthenjum-106
2	Zinc	Strontium-90
		Technicium-99
		Tin-113
	· · · · · · · · · · · · · · · · · · ·	Tritium
		Zinc-65

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Table 4-1.	Target Parameters for Influent Aqueous Waste Analyses.	
	(sheet 2 of 2)	

1	ANIONS	GENERAL CHEMISTRY PARAMETERS
2	Bromide	Ammonia
3	Chloride	Total Kjeldahl nitrogen
4	Fluoride	Cyanide
5	Formate ¹	pH
6	Nitrate	Total suspended solids
7	Nitrite	Total dissolved solids
8	Phosphate	Total organic carbon
9	Sulfate	Specific conductivity

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¹ - Parameter only required for 242-A Evaporator process condensate (refer to Section 3.2).

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5.0 TREATED EFFLUENT SAMPLING AND ANALYSIS

The treated aqueous waste, or effluent, from the ETF is collected in three 2,540,000-liter verification tanks before discharge to the SALDS. To determine whether the Discharge Permit early warning values and enforcement limits and the Delisting criteria are met, the effluent routinely is sampled at or before the verification tanks. The sampling and analyses performed are described in the following sections.

5.1 RATIONALE FOR EFFLUENT ANALYSIS PARAMETER SELECTION

The parameters measured in the treated effluent are required by the following regulatory documents:

- Delisting criteria from the Final Delisting (EPA 1995)
- Effluent limits from the State Waste Discharge Permit (Ecology 1995a)
- Early warning values from the State Waste Discharge Permit (Ecology 1995a).

If the concentration of any analyte is found to exceed a Discharge Permit enforcement limit or a Delisting criterion, the contents of the verification tank are reprocessed and re-analyzed. If the concentration of any analyte exceeds an early warning value, an early warning value report is prepared and submitted to Ecology.

5.2 EFFLUENT SAMPLING STRATEGY: METHODS, LOCATION, ANALYSES, AND FREQUENCY

Effluent sampling methods and locations, the analyses performed, and frequency of sampling are discussed in the following sections.

5.2.1 Effluent Sampling Method and Location

39 Samples of treated effluent are collected and analyzed to verify the treatment process using ETF-specific sampling protocol. These verification 40 samples can be collected at two locations. At the first sampling location, a 41 42 representative grab sample is collected from a sampling port on the verification tank recirculation line. The second sampler is located upstream 43 of the verification tanks where flow proportional composite samples are 44 collected for all analyses except VOC analysis. For VOCs, a zero-headspace, 45 time proportional sampler capable of collecting a sample over a multiple-day 46 period is used. Appendix B presents the sample containers, preservatives, and 47 holding times for each parameter monitored in the effluent. 48 49

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5.2.2 Analyses of Effluent 2

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The parameters required by the current Discharge Permit and Delisting conditions are presented in Table 5-1. The analytical methods and POLs associated with each parameter are provided in Appendix B. The methods and PQLs are equivalent to those used in the analysis of influent aqueous waste. With the exception of formic acid (analyzed as formate), analyses for the constituents associated with the newly listed waste numbers (Section 3.2) 8 already are required analyses in the effluent. An analysis for formate is not 9 10 required unless this constituent is identified in the influent aqueous waste.

5.2.3 Frequency of Sampling

15 Treated effluent is tested for all parameters listed in Table 5-1 on a frequency consistent with the conditions of the Discharge Permit and the Final 16 17 Delisting. Analytical results are received from the laboratory and reviewed before the treated effluent is discharged. The minimum sample collection 18 period typically is 72 hours, representing the amount of time to fill one 19 verification tank at the design flow rate of 562 liters per minute. 20 21

22 During operation of the ETF, if one or more of the constituents exceeds a Delisting criterion, the Delisting conditions require the analysis of samples 23 from two verification tanks (or equivalent volume) before effluent can be 24 discharged. Treated effluent that does not meet Delisting criteria and 25 Discharge Permit is not discharged to the SALDS and is recycled for further 26 27 treatment.

3 4		Final	Discharge Permit ²			
5	Parameter	Delisting ¹	Enforcement Limit	Early Warning Value		
6	VOLA	TILE ORGANIC COMP	OUNDS			
7	Acetone	· X				
8	Benzene	X		. X		
9	l-Butyl alcohol	X				
10	Carbon tetrachloride	X	X			
11	Chlorobenzene	X				
12	Chloroform	X		Х		
13	1,2-Dichloroethane	X		·		
14	1,1-Dichloroethylene	X				
15 16	Methyl ethyl ketone (2-Butanone)	X				
17 18	Methyl isobutyl ketone (4-methyl-2-Pentanone)	. X				
19	Tetrachloroethylene	X	Х			
20	Tetrahydrofuran			Х		
21	Toluene	X				
22	1,1,1-Trichloroethane	X				
23	1,1,2-Trichloroethane	· X		X		
24	Trichloroethylene	Х				
25	Vinyl chloride	X				
26	SEMIVO	LATILE ORGANIC CC	MPOUNDS			
27	Acetophenone			Х		
28	Benzyl alcohol	X				
29	Cresol (total)	X				
30	1,4-Dichlorobenzene	X				
31	Dimethylnitrosamine		X			

Table 5-1. Rationale for Parameters to Be Monitored in Treated Effluent.

	Final	Discharge Permit ²			
Parameter	Delisting ¹	Enforcement Limit	Early Warning Value		
1 Di-n-octyl phthalate	X				
2 Hexachloroethane	X		84-VL3.4		
3 Naphthalene	X				
4 Tributyl phosphate	<u>x</u>				
5	TOTAL METALS ³		· · · · · · · · · · · · · · · · · · ·		
5 Antimony	<u>x</u>				
7 Arsenic	<u>X</u>	x			
8 Barium	X				
9 Beryllium	<u> </u>		Χ		
0 Cadmium	Х		Χ		
1 Chromium	X	X			
2 Copper			X		
3 Lead	<u>x</u>		Χ		
4 Mercury	X		X		
5 Nickel	X				
5 Selenium	<u>x</u>				
7 Silver	X	•			
8 Vanadium	X				
9 Zinc	Х				
0	ANIONS				
1 Fluoride	X				
2 Nitrate (as N)		X			
3 Nitrite (as N)			X		
4 Sulfate			Χ		
5	OTHER ANALYSES	•			
6 Ammonia ⁴ (as N)	Х		Х		

Table 5-1. Rationale for Parameters to Be Monitored in Treated Effluent. (sheet 2 of 3) $% \left(\left(1-\frac{1}{2}\right) \right) =0$

	Final	Discharge Permit ²			
Parameter	Delisting ¹	Enforcement Limit	Early Warning Value		
Total Kjeldahl nitrogen (as N)			X		
Cyanide	X				
Tritium			<u>M</u>		
Strontium-90			M		
Gr <u>oss</u> alpha			M		
Gross beta			M		
Total dissolved solids			X ·		
Total organic carbon			Χ		
Total suspended <u>solids</u>			Χ		
Specific conductivity		М			

Table 5-1.	Rationale fo	r Parameters	to Be	Monitored	in	Treated	Effluent.
		(sheet	3 of 3	5)			

 ¹ Parameters required by the current conditions of the Final Delisting, 40 CFR 261, Appendix IX, Table 2 (EPA 1995).

 Parameters required by the current conditions of the State Waste Discharge Permit, No. ST 4500 (Ecology 1995a).
 Matei a provided as total concentrations

Metals reported as total concentrations.

 4 Although the Final Delisting lists "ammonium" (NH_4^+), the standard analytical methods measure ammonia (NH_3). Ammonia is assumed to be the contaminant of concern.

X Rationale for measuring this parameter in treated effluent.

M Monitor only; no limit defined.

6.0 EFFLUENT TREATMENT FACILITY SECONDARY WASTE SAMPLING AND ANALYSIS

The wastes discussed in this section are managed in the container storage areas of the ETF and include the secondary wastes generated by the ETF processes. This section describes the characterization of the following secondary waste streams generated within the ETF:

• Dry powder waste generated from the treatment process

• Waste generated by operations and maintenance activities

Miscellaneous waste generated within the ETF.

For each waste stream, the waste is described, a characterization methodology and rationale are provided, and sampling requirements are addressed.

6.1 DRY POWDER WASTE

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A dry powder waste is generated from the secondary treatment train, from the treatment of an aqueous waste. Waste is received in the secondary treatment train in waste receiving tanks where it fed into an evaporator. Concentrate waste from the evaporator is then fed to a concentrate tank. From these tanks, the waste is fed to a thin film dryer and dried into a powder, and collected into containers. The containers are filled via a remotely controlled system. The condensed overheads from the evaporator and thin film dryer are returned to the surge tank to be fed to the primary treatment train.

The secondary treatment system typically receives and processes the following by-products generated from the primary treatment train:

- Concentrate from the first RO stage
- Backwash from the rough and fine filters
- Regeneration waste from the ion exchange system

Spillage or overflow collected in the process sumps.

In an alternate operating scenario, some aqueous wastes may be fed to the secondary treatment train before the primary treatment train. A more complete description of these processes can be found in Chapter 4.0 of the dangerous waste permit application for LERF and ETF (DOE/RL-97-03).

43 6.1.1 Rationale for Selection of Parameters for Analysis

Because of radiological and chemical exposure concerns associated with handling the dry powder waste, this waste stream is sampled from the concentrate tanks while in a slurry form and before the waste enters the thin film dryer. Additionally, because the concentrate tank contents are recirculated, a sample from the concentrate tanks is more representative of the secondary waste generated from treating an aqueous waste than a sample of dry powder from a drum.

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Each sample will undergo a total solids analysis. The values from these analyses will be used to report the concentrations of other parameters on a dry weight basis. The dry weight concentration will provide a conservative representation of the concentration of the powder after the thin film dryer. The parameters for analysis of the concentrate tank waste (i.e., dry powder) and the rationale for selection are provided in Table 6-1. The specific analytical methods for these analyses are provided in Appendix B.

9 Parameters for analysis of the concentrate tank waste are selected to properly designate and determine if the dry powder waste meets LDR treatment standards. The data from the analysis of the powder waste are transmitted to the receiving TSD unit, as required for any LDR notifications and final documentation (see Section 6.1.4 for LDR discussion). Process knowledge and analytical data, from the initial characterization of an aqueous waste, also could be used to designate the dry waste powder.

The dry powder waste is anticipated to consist primarily of sulfate salts, radionuclides, and minor amounts of metals. VOCs and SVOCs are not expected. The FOO1 through FOO5 listed waste numbers apply to dry powder waste that is derived from the treatment of PC, a mixture of PC, or any dangerous waste with these listed waste numbers. In the case where the powder waste is listed, the waste is sampled for the listed waste constituents to confirm that the powder meets applicable LDR treatment standards.

25 Sampling and analyzing the concentrate tank waste to represent the dry 26 powder waste is a conservative approach. In fact, in some instances this 27 approach may over-estimate the concentrations of a constituent in the powder 28 waste. Therefore, in those instances where the analytical results from the 29 concentrate tank waste indicate that the dry powder waste exceeds an LDR 30 treatment standard or that the powder would designate as a characteristic 31 waste, the actual dry powder waste will be sampled and analyzed. In this situation, the data from the actual powder will be used for the designation 32 33 and LDR determinations. 34

36 6.1.2 Sampling Methods 37

38 Concentrate tank waste samples are collected from recirculation lines, 39 which provide mixing in the tank during pH adjustment and prevent caking. The 40 protocol for concentrate tank sampling prescribes opening a sample port in the 41 recirculation line to collect samples directly into sample containers. The 42 sample port line is flushed before collecting a grab sample. The VOC sampling is performed first. Each VOC sample container will be filled such that 43 44 cavitation at the sample valve is minimized and the container has no head space. The SVOC sample containers will be filled next followed by containers 45 for the remainder of the analytes. 46 47

The dry powder will be sampled from containers using the principles presented in SW-846 (EPA 1986) and ASTM Methods (American Society for Testing Materials) D245-75, as referenced in WAC 173-303-110(2). The sample container requirements, sample preservation requirements, and maximum holding times for each of the parameters analyzed in either matrix are presented in Appendix B.

6.1.3 Sampling Frequency

 On initiation of treatment of an aqueous waste(s), concentrate tank waste from the first three concentrate tanks or equivalent volume (i.e., 15,000 gallons of concentrate) will be sampled and analyzed for the parameters identified in Table 6-1. These samples and analytical results will be used to represent the powder waste generated from the treatment of that aqueous wastes(s). The concentrate tanks will be re-sampled in the following situations:

- The LERF and the ETF management has been notified, or has reason to believe that the process generating the waste has changed (for example, a change in the source such as a change in the well-head for groundwater)
- The LERF and the ETF management notes an increase or decrease in the concentration of a constituent in an aqueous waste stream, beyond the range of concentrations that was described or predicted in the waste characterization.

As indicated in Section 6.1.1, when the analytical results from the concentrate tank waste indicate that the dry powder waste exceeds an LDR treatment standard or that the powder would designate as a characteristic waste, the actual dry powder waste will be sampled and analyzed. In this case, the data from the actual powder will be used for the designation and LDR determinations.

6.1.4 Special Requirements Pertaining to Land Disposal Restrictions

Containers of the dry powder waste are transferred to a storage or final disposal unit, as appropriate (e.g., the Central Waste Complex or to the Environmental Restoration Disposal Facility). The ETF personnel provide the analytical characterization data and necessary process knowledge for the waste to be tracked by the receiving staff, and for the appropriate LDR documentation.

The following information on the dry powder waste is included on the LDR notification provided to the receiving unit:

- Dangerous waste numbers (as applicable)
- The corresponding treatment standards set forth in 40 CFR 268 (WAC 173-303-140) and all applicable constituents listed in 40 CFR 268.48 that is reasonably expected to be in the waste
- The waste tracking information associated with the transfer of waste
- Waste analysis results.

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6.2 OPERATIONS AND MAINTENANCE WASTE GENERATED AT THE 200 AREA EFFLUENT TREATMENT FACILITY

4 Operation and maintenance of process and ancillary equipment generates 5 additional routine waste. These waste materials are segregated to ensure 6 proper handling and disposition, and to minimize the commingling of 7 potentially dangerous waste with nondangerous waste. The following waste 8 streams are anticipated to be generated during routine operation and 9 maintenance of the ETF. This waste might or might not be dangerous waste, 10 depending on the nature of the material and its exposure to a dangerous waste.

- Spent lubricating oils and paint waste from pumps, the dryer rotor, compressors, blowers, and general maintenance activities
- Spent filter media from coarse and fine filters
- Spent ion exchange resin
- HEPA filters
- UV light tubes
- RO membranes
- Equipment that cannot be returned to service
- Other miscellaneous waste that might contact a dangerous waste (e.g., plastic sheeting, glass, rags, paper, waste solvent or aerosol cans).

30 These waste streams are stored at the ETF before being transferred for 31 final treatment, storage, or disposal as appropriate. This waste is 32 characterized and designated using process knowledge (from previously determined influent aqueous waste composition information); analytical data; 33 34 and material safety data sheets (MSDS) of the chemical products present in the 35 waste or used (these data sheets are maintained at the ETF). Sampling of 36 these waste streams is not anticipated; however, if an unidentified or 37 unlabeled waste is discovered, that waste is sampled. This 'unknown' waste is 38 sampled and analyzed for the parameters in Table 6-1 as appropriate, and will be designated according to Washington state regulatory requirements. The 39 40 specific analytical methods for these analyses are provided in Appendix B. 41

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43 6.3 OTHER WASTE GENERATED AT THE 200 AREA EFFLUENT TREATMENT FACILITY

There are two other potential sources of waste at the ETF: spills and/or overflows, and discarded chemical products. Spilled material that potentially might be dangerous waste generally is routed to the ETF sumps where the material is transferred to either the surge tank for treatment or to the secondary treatment train. A spilled material also could be containerized and transferred to another TSD unit. In most cases, process knowledge and the use of MSDSs is sufficient to designate the waste material. If the source of the spilled material is unknown and the material cannot be routed to the ETF sumps, a sample of the waste is collected and analyzed according to Table 6-1, as necessary, for appropriate characterization of the waste. Unknown wastes will be designated according to Washington state regulatory requirements. The specific analytical methods for these analyses are provided in Appendix B.

8 A discarded chemical product waste stream could be generated if process 9 chemicals, cleaning agents, or maintenance products become contaminated or are 10 otherwise rendered unusable. In all cases, these materials are appropriately 11 containerized and designated. Sampling is performed, as appropriate, to 12 determine the radioactivity of a waste or if required for waste designation.

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Table 6-1. 200 Area Effluent Treatment Facility Powder, Concentrate Tank, Maintenance and Operations, and Unknown Waste Sampling.

Parameter	Rationale				
Total Solids ²	 Calculate dry weight concentrations 				
Volatile organic compounds	 LDR - verify treatment standards 				
Semivolatile organic compounds	 LDR - verify treatment standards 				
Metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver)	 Waste designation LDR - verify treatment standards 				
Nitrate	 Address receiving TSD waste acceptance requirements 				
pH	 Waste designation 				

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For concentrate tank samples, the total sample (solid plus liquid) is analyzed and the projected dry weight compared to the Toxicity Characteristic (TC) constituent limits (WAC 173-303-090(8)). If the TC limit is met or exceeded, the waste is designated accordingly. All measured parameters are compared against the corresponding treatment standards.

2 Total solids is not determined for unknown waste samples and is only analyzed in maintenance waste samples, as appropriate (e.g., percent water is not required for such routine maintenance waste as aerosol cans, fluorescent tubes, waste oils, batteries, etc.).

LDR = land disposal restrictions.

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7.0 QUALITY ASSURANCE/QUALITY CONTROL

The following quality assurance/quality control (QA/QC) information for the ETF and LERF is provided as required by WAC 173-303-810(6). The sampling and analysis activities at the ETF and LERF conform to the requirements of a ETF/LERF-specific quality assurance project plan and are in accordance with the following EPA guidance documents:

- Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, Third Edition, as amended, U.S. Environmental Protection Agency, Washington, DC, July 1992, as referenced in WAC 173-303-110.
- Methods for Chemical Analysis of Water and Wastes, EPA-600/4-7-020, U.S. Environmental Protection Agency, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio, March 1993.

7.1 SAMPLING PROGRAM

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Typically generators are responsible for the sampling and analysis of an influent aqueous. However, samples of influent aqueous waste can be collected at the LERF or the Load-In Station. Samples of treated effluent are collected at the verification tanks. The dry powder waste is typically sampled from the concentrate tanks while in a slurry form. Sampling of influent aqueous waste, treated effluent, and secondary waste is discussed in Sections 4.0, 5:0, and 6.0, respectively, of the WAP.

29 Specific information on sample holding times, preservatives, and sample containers is provided in Appendix B. The selection of the sample collection 30 device depends on the type of sample, the sample container, the sampling 31 location and the nature and distribution of the waste components. In general, 32 33 the methodologies used for specific materials correspond to those referenced 34 to WAC 173-303-110(2). The selection and use of the sampling device is supervised or performed by a person thoroughly familiar with the sampling 35 36 requirements. Samples are collected according to ETF/LERF-specific sampling 37 protocol.

39 Sampling equipment is constructed of nonreactive materials such as glass, 40 PVC plastic, aluminum, or stainless steel, as indicated by the nature and 41 matrix of the waste. Care is taken in the selection of the sampling device to 42 prevent contamination of the sample and to ensure compatibility of materials. 43 For example, plastic bottles are not used to collect some organic wastes. 44

7.2 ANALYTICAL PROGRAM

The onsite laboratory employed by the ETF and LERF organization is required to have a program of quality control practices and procedures to ensure that precision and accuracy are maintained. The quality control program of the onsite analytical laboratory is based on the Hanford Site analytical services quality assurance/quality control requirements. Offsite

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7.2 ANALYTICAL PROGRAM

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3 The onsite laboratory employed by the ETF and LERF organization is 4. required to have a program of quality control practices and procedures to 5 ensure that precision and accuracy are maintained. The quality 6 control/quality assurance program of the onsite analytical laboratory is based 7 on the Hanford Site analytical services guality assurance/guality control 8 requirements. Offsite laboratories employed by the ETF and LERF must meet the 9 same OA/OC requirements as onsite laboratories and must demonstrate quality control practices that are comparable to the onsite laboratory's program. A 10 11 review of an offsite laboratory may be conducted to ensure that the quality 12 control of ETF and LERF data is maintained. The SW-846 analytical methods are 13 followed (as indicated in Appendix B). However, other methods may be 14 substituted for a parameter if the POL can be met. 15

16 The chemical parameters and associated analytical methods identified in 17 Appendix B are used to characterize an influent aqueous waste, effluent waste, 18 and ETF secondary waste. The analytical data on these parameters are also 19 used to establish that key decision limits pertinent to proper waste 20 management are met. These key decision limits are numerical thresholds which 21 include: 22

- liner compatibility limits for an influent aqueous waste as managed in LERF (may include blending a waste with other wastes to meet these limits)
- the LDR status of the ETF secondary waste
- delisting limits for treated effluent.

31 Where analytical data are used in key decision making, the PQL of an 32 analytical parameter (or sum of the PQLs, as indicated by the decision) must 33 be at or below the key decision limit. 34

Good laboratory practices which encompass sampling, sample handling, housekeeping and safety are maintained at all laboratories. The following section describe the specific practices which are implemented at the onsite laboratory to maintain the precision and accuracy goal of \pm 20 percent for quality control samples which include method blank, quality control check, matrix spike, and duplicate samples.

42 The decision to re-analyze if the stated precision and accuracy goals are 43 not met will depend on the use of the analytical results. Generally, only 44 analytical results used in key decisions would require re-analysis if 45 precision and accuracy goals were not met. For example, if the precision and 46 accuracy goals are not met in a liner compatibility analysis, the sample would 47 generally be re-analyzed if the results were close to a compatibility limit. 48 However, if the analytical results suggested that concentrations were an order 49 of magnitude below a liner compatibility limit, generally re-analysis would 50 not be required. The decision to re-analyze a waste in a key decision situation will be made on a case-by-case basis. 51 52

7.2.1 Contamination Evaluation

Method blank samples are prepared with each batch of samples (at least 1 in batch of 20) and analyzed to ensure sample contamination has not occurred.

7.2.2 Quality Control Check Sample

A quality control check sample is analyzed with each batch (at least 1 in batch of 20) for each analytical parameter determined. The results show that analytical procedures are properly performed and that calibration and standardization of instrumentation are within acceptable limits per the method.

7.2.3 Matrix Spike Analyses

Matrix spike samples are employed to monitor recoveries and demonstrate accuracy. Matrix spike samples are periodically analyzed to provide information about the effect of the sample matrix on the analyte in question. Typically a ratio of one spike for each analytical batch of samples, or 1 in 20, is maintained.

7.2.4 Duplicate Analyses

A laboratory sample duplicate or a matrix spike duplicate is analyzed to assess analytical precision in the laboratory. Typically, a ratio of one duplicate sample for each analytical batch of samples, or 1 in 20, is maintained.

7.3 CONCLUSION

The aforementioned sampling and analytical quality practices help ensure that the data obtained are precise and accurate for the waste stream being sampled. The analytical results are used by ETF and LERF management to decide whether or not to accept a particular waste stream and, upon acceptance, to determine the appropriate method of treatment, storage, and disposal. Results are also important to ensure that wastes are managed properly by the ETF and LERF and that incompatible wastes are not inadvertently combined. Just as these results are important, so is the quality of these results. Thus, the quality of the analytical data, the thoroughness and care with which the sampling and analyses are performed and reported, provides an important basis for day-to-day operational decisions. This page intentionally left blank.

8.0 REFERENCES

DOE/RL-92-72, 200 Area Effluent Treatment Facility Delisting Petition, Revision 1, 1993, U.S. Department of Energy-Richland Operations Office, Richland, Washington.

DOE/RL-97-03, Hanford Facility Dangerous Waste Permit Application, Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility, U.S. Department of Energy, Richland Operations Office, Richland, Washington.

Ecology, 1994, Dangerous Waste Portion of the Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Number WA7890008967, (Revision 3, December 1996), Washington State Department of Ecology, Olympia, Washington.

Ecology, 1995a, State Waste Discharge Permit No. ST 4500, as amended, for 200 Area Effluent Treatment Facility, Hanford Facility, Washington State Department of Ecology, Olympia, Washington, June 26, 1995.

- Ecology, 1995b, "Listed Waste from Hanford Laboratories", letter from M. Wilson, Washington State Department of Ecology, to J. Rasmussen, U.S. Department of Energy, Richland Operations Office, March 7, 1995.
- Ecology, 1996a, Dangerous Waste Permit Application Permit Requirements, #95-402, June 1996, Washington State Department of Ecology, Olympia, Washington.
- Ecology, 1996b, "The Washington State Department of Ecology (Ecology) Regulatory Interpretation of the Liquid Effluent Retention Facility (LERF) Land Disposal Restriction Exemption", letter from Washington State Department of Ecology to T. Teynor, U.S. Department of Energy and A. Diliberto, Westinghouse Hanford Company, September 9, 1996.
- EPA, 1986, Test Methods for Evaluating Solid Waste Physical/Chemical Methods, SW-846 (Third Edition, November 1986, as amended), U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, Washington, D.C.
- EPA, 1994, "Liquid Effluent Retention Facility (LERF) Land Disposal Restrictions Treatment Exemption - Regulatory Interpretation EPA/Ecology ID No: WA7890008967", letter from U.S. Environmental Protection Agency, Region 10 to J. Hennig, U.S. Department of Energy, December 6, 1994.
- 46 EPA, 1995, Final Delisting [Exclusion], issued to U.S. Department of Energy,
 47 40 CFR 261, Appendix IX, Table 2 (60 FR 31115, June 13, 1995),
 48 U.S. Environmental Protection Agency, Washington, D.C.
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APPENDICES

A TYPICAL AQUEOUS WASTE PROFILE SHEET

ANALYTICAL METHODS, SAMPLE CONTAINERS, PRESERVATIVE METHODS, AND HOLDING TIMES

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APPENDIX A

TYPICAL AQUEOUS WASTE PROFILE SHEET

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200 AREA LIQUID WASTE PROCESSING AQUEOUS PROFILE SHEET

(Please carefully read the instructions before completing this form)

	Generating Facility/Location: Facility Manager:	
	Technical Contact/Phone:	
	Environmental Compliance Officer/Phone:	
	DOE Point of Contact:	
GEN	IERAL WASTE INFORMATION	
1.	Description of Process Generating Aqueous Waste:	
	·	····
2.	Is the aqueous from a CERCLA or state mandated cleanup? YesNo	
	Describe Cleanup Activity:	
3.	A. Is this a dangerous or hazardous waste (40 CFR Part 261 or WAC 173-303-070)? Yes No	
	B. If yes, identify ALL hazardous/dangerous listed and characteristic waste code numbers (D,F,K,P,U):	
	· · · · · · · · · · · · · · · · · · ·	
	C. State Waste Codes Explain designation for State waste codes:	
i. shi	PPING/TRANSPORTATION INFORMATION	
A.	CONTAINMENT/PACKAGING: Bulk Liquid Total Volume; Drum Number:	Total Volume:
	Other	
B.	SHIPPING FREQUENCY: Units Per:MonthQtrYear	
	One Time Other	
C.	TRANSPORTATION:	
	1. Is this a DOT Hazardous Material? Yes No	
	2. Proper Shipping Name:	
	3. Hazard Class:	
	4: CERCLA Reportable Quantity (RQ) and unit (as applicable):	<u> </u>
	5. Transportation Method (e.g., direct pipeline, tanker):	<u></u>
	ATOR'S CERTIFICATION	

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APPENDIX B

ANALYTICAL METHODS, SAMPLE CONTAINERS, PRESERVATIVE METHODS, AND HOLDING TIMES

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Table B-1.	Sample	and	Analysis	Criteria	for	Influent	Aqueous	Waste	and	Treated	Effluent	
				(sh	eet	1 of 6)						

	· · · · · · · · · · · · · · · · · · ·	heet 1 of	······································	
Parameter	Analytical method*	Method PQL ^b	Accuracy/Precision for Method [*] (percent)	Sample container°/ Preservative°/ Holding time ^d
	VOLATI	LE ORGANIC CO	MPOUNDS	
Acetone		40	50-100	
Benzene		5	40-150	Sample container
1-Butyl alcohol (1-Butanol)		500	40-150	2 x 40-mL amber glass with
Carbon tetrachloride		5	65-130	septum
Chlorobenzene		5	40-150	Preservative
Chloroform		5	50-130	1:1 HCl to pH<2; 4°C '
1,2-Dichloroethane	8260A	5	50-150	
1,2-Dichloroethene	8200A	5	50-150	Holding time 14 days
1,1-Dichloroethylene		5	60-130	
2-Kexanone		50	60-130	
Methylene chloride ^f		5	50-150	
Methyl ethyl ketone (2-Butanone)		100	65-130	
Methyl isobutyl ketone (Hexone, 4-Methyl-2-pentanone)		50	50-160	5.
2-Pentanone		10	50-160	
Tetrachloroethylene		5	65-140	
Tetrahydrofuran]	100	47-150	
Toluene].	5	50-160	
1,1,1-Trichloroethane		5	50-150	
1,1,2-Trichloroethane		5	50-150	
Trichloroethylene]	5	70-155	
Xylene		5	50-150	
Vinyl chloride]	10	40-130	

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Parameter .	Analytical method [®]	Method PQL [®]	Accuracy/Precision for Method [®] (percent)	Sample container ^e / Preservative ^e / Holding time ^e
SEMIVOLATIL	E ORGANIC COMPOUNDS	a standard		
Acetophenone		10	70-110	
Benzyl alcohol		20	70-120	<u>Sample container</u> 4 x 1-liter amber glass
2-Butoxyethanol		1000	65-105	Preservative
Cresol (o, p, m)	8270B	· 10	55-115	4°C Holding time
1,4-Dichlorobenzene		10	45-95	7 days for extraction; 40 days
Dimethylnitrosamine		10	50-120	for analysis after extraction
2,4-Dinitrotoluene		10	65-100	
Di-n-octyl phthalate		10	70-130	
Hexachloroethane		10	50-110	
Naphthalene		10	60-120	
Tributyl phosphate		100	75-125	

Table B-1. Sample and Analysis Criteria for Influent Aqueous Waste and Treated Effluent. (sheet 2 of 6)

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Parameter	Analytical method*	Method PQL [®]	Accuracy/Precision for Method [*] (percent)	Sample container°/ Preservative°/ Holding timeª
		TOTAL METALS		
Aluminum	6010A/EPA-600 200.7	450	75 - 125	
Antimony	EPA-600 200.8	30	75 - 125	<u>Sample container</u> 1 x 0.5-liter plastic/glass
Arsenic	EPA-600 200.8	15	75 - 125	
Barium	6010A/EPA-600 200.7	20	75 - 125	Preservative 1:1 HNO, to pH<2
Beryllium	6010A/EPA-600 200.7	40	75 - 125	
Cadmium	EPA-600 200.8	5	75 - 125	Holding time 180 days; mercury 28 days
Calcjum	6010A/EPA-600 200.7	100	75 - 125	
Chromium	7191/EPA-600 200.8	20	75 - 125	
Copper	6010A/EPA-600 200.7	70	75 - 125	
Iron	6010A/EPA-600 200.7	100	75 - 125	
Lead	EPA-600 200.8	10	75 - 125	
Magnesium	6010A/EPA-600 200.7	300	75 - 125	
Manganese	6010A/EPA-600 200.7	50	75 - 125	
Mercury	EPA 245.1/EPA-600 200.8	2	75 - 125	
Nickel	6010A/EPA-600 200.7	75	75 - 125	
Potassium	6010A/EPA-600 200.7	10,000	75 - 125	
Selenium	EPA-600 200.8	20	75 - 125	
Silicon	6010A/EPA-600 200.7	580	75 - 125	
Silver	6010A/EPA-600 200.7	70	75 - 125	
Sodium	6010A/EPA-600 200.7	290	75 - 125]
Uranîum	EPA-600 200.8	5	75 - 125	
Vanadium	6010A/EPA-600 200.7	80	75 - 125	
Zinc	6010A/EPA-600 200.7	20	75 - 125	

Parameter	Analytical method*	Method PQL ^b	Accuracy/Precision for Method ⁴ (percent)	Sample container ^c / Preservative ^c / Holding time ^d
	G	ENERAL CHEMIST	RY	i and a second secon
Bromide		2000	75 - 125	Sample container
3 Chloride	EPA-600 300.0	1000	75 - 125	1 x 1-liter glass
Fluoride		500	75 - 125	Preservative
5 Formate'		1250	75 - 125	4°C
Nitrate		100	75 - 125	Holding time
7 Nitrite		100	75 - 125	28 days
3 Sulfate		10,000	75 - 125	
Phosphate		1500	75 - 125	
D Ammonia°	EPA-600 350.3/350.1	40	75 - 125	<u>Sample container</u> 250 mL glass <u>Preservative</u>
l Total Kjeldahl nitrogen	EPA-600 351.2	600	75 - 125	H _z SO ₄ to pH<2; 4 °C <u>Holding time</u> 28 days
2 Cyanide	9010A/ EPA-600 335.3	100	75 - 125	Sample container 500 mL polyethylene <u>Preservative</u> 6M NaOH to pHb12; 4°C <u>Holding time</u> 14 days
Total dissolved solids	EPA-600 160.1	RL 10,000	75 - 125	Sample container
Total suspended solids	EPA-600 160.2	RL 4,000	75 - 125	1 L glass <u>Preservative</u>
Specific conductivity	EPA-600 120.1 (in lab)	RL 10°	75 - 125	None <u>Holding time</u> 7 days
[#] Kq [0	EPA-600 150.1/9040	RL +/- 0.1	75 - 125	for pH - as soon as practical
7 Total organic carbon	9060A	RL 1,000	75 - 125	Sample container 250 mL glass Preservative HCl or H ₅ CQ, to pH<2; 4°C <u>Holding time</u> 28 days

Table B-1. Sample and Analysis Criteria for Influent Aqueous Waste and Treated Effluent. (sheet 4 of 6)



		(\$	heet 5 of	6)	
	Parameter	Analytical method ^a	Method PQL ^b	Accuracy/Precision for Method ^k (percent)	Sample container°/ Preservative°/ Holding time
1	· · · ·	· · · ·	RADIONUCLIDES	,	
2 Gross alp	oha	Laboratory specific	3 pCi/L	NA	Sample container
3 Gross bet	ta	Laboratory specific	4 pCi/L	NA	4 x 1-L glass
4 Americium	n~241	Laboratory specific	NA	NA	Preservative
5 Antimony-	-125	Laboratory specific	NA	NA	HNO3 to pH < 2
6 Cerium-14	44	Laboratory specific	NA	NA	Holding time
7 Cesium-13	34	Laboratory specific	NA	NA	180 days
8 Cesium-13	37	Laboratory specific	NA	NA	
9 Cobalt-60)	Laboratory specific	NA	NA	
10 Curium-24	42	Laboratory specific	NA	NA	
11 Curium-24	44	Laboratory specific	NA	NA	
12 Europium-	-152	Laboratory specific	NA	NA	
13 Europium-	- 154	Laboratory specific	NA	NA	
14 Europium-	- 155	Laboratory specific	NA	NA	
15 Neptunium	n-237	Laboratory specific	NA	NA	
16 Niobium-S	74	Laboratory specific	NA	NA	
17 Plutonium	n-238	Laboratory specific	NA	NA	
18 Plutonium	n-239/240	Laboratory specific	NA	NA	
19 Radium-22	26	Laboratory specific	NA	NA	
20 Ruthenium	n-103	Laboratory specific	NA	NA	
21 Ruthenium	n-106	Laboratory specific	NA	NA	
22 Strontium	n-90	Laboratory specific	5 pCi/L	NA	
23 Tin-113		Laboratory specific	NA	NA	
24 Zinc-65	····	Laboratory specific	NA	NA	

Table B-1. Sample and Analysis Criteria for Influent Aqueous Waste and Treated Effluent.

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		(9 10 9 100	aus)			
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bətutitzduz əd thçim	oted. Other methods	ı əsiwnədti		are sbodtem 848-WS ^e 9d nso JO9 PGLsoifqqs
evep 081	AN	זיע ¢00 לין∕ר	Laboratory specific	ritjum
No preservative added	AN	٧N	Laboratory specific	echnicium-99
Preservative	AN	AN	Laboratory specific	921-9nibo
Sample container	AN	AN	Laboratory specific	arbon-14
\"neristros elques \"servative" "emit eniblo#	Accuracy/Precision for Method (percent)	PgL ⁵ Method	"bodt∋m lssitylsnA	Parameter

however, PQL is affected by sample matrix. PQL units are parts per billion unless otherwise noted. ^в РQL is determined from method detection level (MDL), where РQL = IQ <u>х</u> MDL (for reagent-grade water);

sample volumes and preservatives may be adjusted per laboratory directions.

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evalue of the stand of the second of the second of the standard analytical measure as the second of the second of

 M_{3} , Momenta is a summary of the contaminant of concern.

.puildmes the chloride is not analyzed for treated effluent sampling.

Conductivity reported in micromhos per centimeter

.Vino sizew suosupa insultni ni berotinom Hq

Analysis for formate only required if detected in the influent aqueous waste.

PQLs provided for those radionuclides which are monitored as part of the Discharge Permit.

Accuracy/precision used to confirm or re-establish MDL.

. VOA refrigerated composite sampler with syringe requires no chemical preservative.

.retifilim = שר

pCi/L = picocuries per liter. . timil pritroger = ЪL

timif noitstitusp fesitssrg = PQL

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Table B-2. Sample Containers, Preservative Methods, and Holding Times for ETF Powder, Concentrate Tank, Maintenance and Operations, and Unknown Waste.

Parameter	Analytical Method ^a	PQL	Accuracy/Precision for Method ^e (percent)	Container⁴	Preservative*	Holding time ^r
Total Solids	EPA-600 160.3	10,000	75 - 125	1-liter glass	None	180 days
pH	WAC 173-303-110 (3)(a)(ii)% EPA-600 150.1/9040	±0.1				as soon as practical
Nitrate	EPA-600 300.0/9056	see Table B-1	1			28 days
Volatile organic compounds (combined method target compound lists)	8240 or 8260A	see Table B-1	See Table B-1	2-40 ml amber glass w/septum	None	7 days
Semivolatile organic compounds (method target compound list)	8270B	see Table B-1	See Table B-1	4-1,000 ml amber glass	None	Extract within 7 days; analyz extract within 40 days
Mercury	EPA-600 200.8, 245.1/6020	see Table B-1	75 - 125	500 ml	None	Mercury 28
Selenium	EPA-600 200.8/6020	see Table B-1	-	plastic/glass		days; 6 months all others
Arsenic	EPA-600 200.8/6020	see Table B-1				
Cadmium	EPA-600 200.8/6020	see Table B-1				
Total metals (method target list)	EPA-600 200.8 6020/6010A/7000 Series	see Table B-1				
Toxicity Characteristic Leaching Procedure [®]	1311	NA	NA	NA	NA	NA

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SW-846 methods are presented unless otherwise noted. Other methods might be substituted if the applicable PQL can be met. b

PQL is determined from method detection level (MDL), where PQL = 10 x MDL (may vary depending on matrix). PQL units are parts per billion unless otherwise noted.

Precision/accuracy used to confirm or re-establish MDL. d

Container size and type could be changed as directed by the laboratory, or as required by the analytical method. е

No preservatives are added to containers due to the anticipated high concentrations of salts.

Holding time = time between sampling and analysis.

For solid waste. h

Extraction procedure, as applicable; extract analyzed by referenced methods [WAC 173-303-110(3)(c)].

PQL = practical quantitation limit MDL = method detection level

mL. = milliliter.

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APP B-2

> DOE/RL-97-03, Rev 07 õ

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APPENDIX 4A

DETAILED DRAWINGS FOR THE LIQUID EFFLUENT RETENTION FACILITY

1 Drawings of the containment systems at the LERF are summarized in 2 Table 4A-1. Because the failure of these containment systems at LERF could 3 lead to the release of dangerous waste into the environment, Engineering 4 Change Notices (ECNs) which affect these containment systems will be submitted to the Washington State Department of Ecology, as a Class 1, 2, or 3 permit 5 6 modification, as required by WAC 173-303-830.

8

Table 4A-1. Liquid Effluent Retention Facility Containment System.

LERF	System	Drawing Number	Outstanding ECNs	Drawing Title
Botto	òm Liner	H-2-79590, Rev. 3	None	Civil Plan, Sections and Details; Cell Basin Bottom Liner (Sheet 1)
Тор І	liner	H-2-79591, Rev. 3	None	Civil Plan, Sections and Details; Cell Basin Bottom Liner (Sheet 1)
Catcl	n Basin	H-2-79593, Rev. 4	None	Civil Plan, Section and Details; Catch Basin (Sheet 1)

P&ID - piping and instrumentation diagram.

17 The drawings identified in Table 4A-2 illustrate the piping and instrumentation configuration within LERF, and of the transfer piping systems between the LERF and the 242-A Evaporator. These drawings are provided for general information and to demonstrate the adequacy of the design of the LERF 18 19 20 as a surface impoundment. An update to these drawings and drawings identified 21 22 in Table 4A-1 will be provided annually to the Washington State Department of 23 Ecology.

24

15 16

Table 4A-2. Liquid Effluent Retention Facility Piping and Instrumentation.

LERF System	Drawing Number	Outstanding ECNs	Drawing Title
Transfer Piping 242-A Evaporator		None	Piping Plot and Key Plans; 242-A Evaporator Condensate Stream (Sheet 1)
LERF Piping and Instrumentation	H-2-88766, Rev. 1	None	P&ID LERF Basin and ETF Influent (Sheet 1)
LERF Piping and Instrumentation		None	P&ID LERF Basin and ETF Influent (Sheet 2)
LERF Piping and Instrumentation		ECN-632885	P&ID LERF Basin and ETF Influent (Sheet 3)
LERF Piping and Instrumentation		None	P&ID LERF Basin and ETF Influent (Sheet 4)
	H-2-89351, Rev. 3	None	Piping & Instrumentation Diagram - Legend

38

P&ID - piping and instrumentation diagram.

	ENGINEERING	CHANGE NOTICE	, -	ctual pages	1. ECN 632885
 2. ECM Category (mark one) Supplemental [X] Direct Revision [] Change ECM [] Standby [] Standby [] Cancel/Void [] 11a. Modification Work [] Yes (fill out Blk. 11b) [] Ho (HA Biks. 11b, 11c, 11d) 12. Description of Change DOCUMENTS CHANGED H-2-79634, SH 1, Ri H-2-88775, SH 1, Ri H-2-88772, SH 1, Ri H-2-88772, SH 1, Ri H-2-88773, SH 1, Ri H-2-88774, SH 1, Ri H-2-88775, SH 1, Ri H-2-8875, SH 1, Ri	and Telephone No. Richard N. Kyl 373-4546 5. Project Title/No. LERF Pif Modifica 8. Document Numbers (includes sheet r SEE 11b. Work Package No. EL-96-00685 V 2 V 1 V 1 V 1 V 1 V 1 S 3-8 FOR DESCR ne) Design Improvement Facilitate Const Ins to Catch Bas for Combination	e, ICF KH, S2-01, /Work Order No. Ding Header tion/E50221 Changed by this ECM No. and rev.) SLOCK 12 The. Modification Work Cog. Engineer Signati Base Line IPTION OF CHANGES [] Environmental [] Const. Error/C in 43 piping at th of LERF Options #	re & Date Doc. YE ********* [] mission [] e LERF, a: 2, #4, and	Facilit Design s. JFac. No. Basin L-43 ECH No(s). 632887 A- 11d. Restor tion (Temp. Cog. Engl S	4. Date June 14, 1996 7. Approval Designator SQ 10. Related PO No. NA ed to Original Condi- or Standby ECN only) incer Signature & Date ry Deactivation [] Error/Omission [] ed in Letter No.
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ENGINEERING CHANGE NOTICE CONTINUATION SHEET

Page 3 of

DESCRIPTION OF CHANGES

1. H-2-88770, SH 1, REV 1

Revise piping plan, add section L, and add notes as shown on page 4 of this ECN.

2. <u>H-2-88772, SH 1, REV 1</u>

Add pipe sections F, G, H, J, and K as shown on page 5 of this ECN.

3. H-2-88773, SH 1. REV 1

Revise pipe support schedules as shown on page 6 of this ECN.

4. H-2-79634, SH 1, REV 2

Revise pipe support schedule as shown on page 7 of this ECN.

5. <u>H-2-88766, SH 3, REV 1</u>

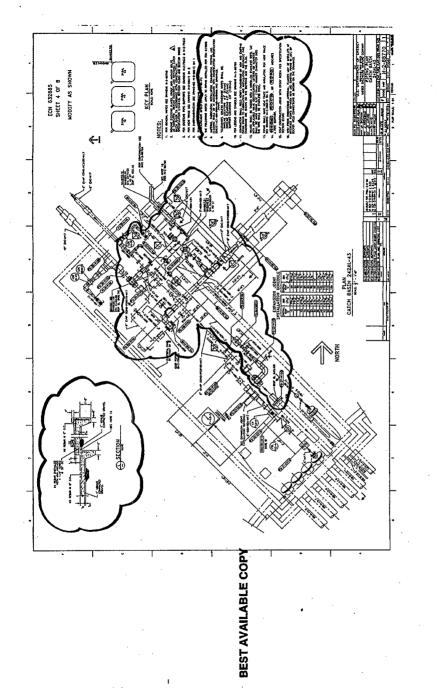
Revise P&ID as shown on page 8 of this ECN.

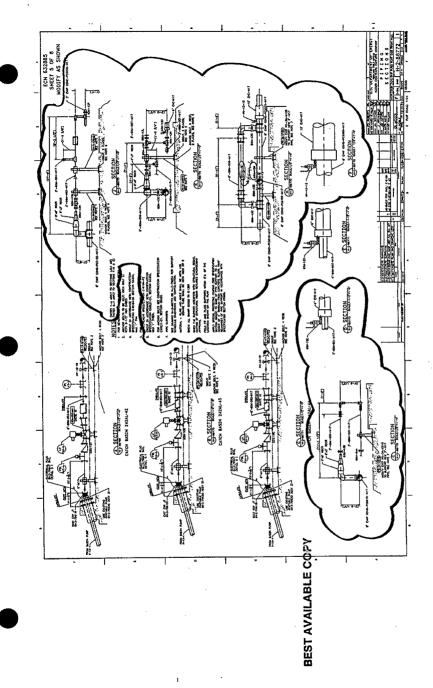
6. H-2-88737, SH 1, REV 1

At Zone A6, under CALCULATIONS, add:

E50221-M-1, PIPE STRESS ANALYSIS FOR LERF BASIN 242AL-43 PIPING MOD OPTION -- #13. THIS ANALYSIS SUPPLEMENTS SECTION 2 OF THE PIPING FLEXIBILITY ANALYSIS BY FIBERCAST COMPANY, SANDSPRINGS, OKLAHOMA, FOR BASIN 242AL-43 PIPING SYSTEM.

A-7900-013-4 (04/94) GEF094





DWG H-2-88773

MODIFY AS SHOWN BELOW

ECN 632885 SHEET 6 OF 8

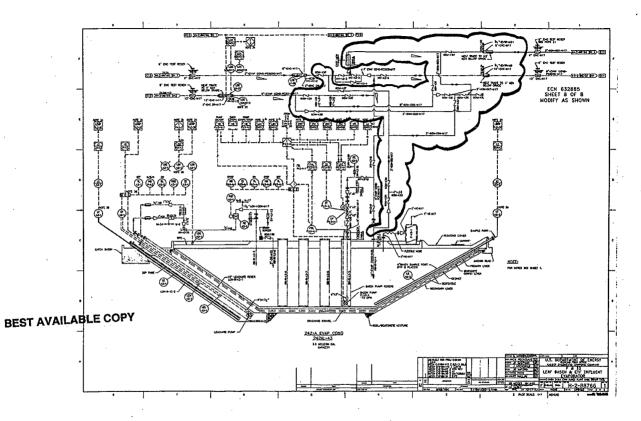
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	(PS-21-C018)	6"	1'-1"	8"	8"	EXISTING CONCRETE BASE						•
	(PS-31-C018)	6"	1'-1"	8"	8"	EXISTING CONCRETE BASE]					
	(PS-35-C018)	6"	1'-1"	8"	8"	NEW CONCRETE BASE - SEE DET 2						
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	(PS-47-C018)	4"	10-3/8"	5-3/8"	5-3/8"	NEW CONCRETE BASE - SEE DET 2						· · · · · · · · · · · · · · · · · · ·
	(PS-48-C018)	4"	10-3/8"	5-3/8"	5-3/8"	NEW CONCRETE BASE - SEE DET 5		02	16-C018) 12"	1	NEW CONCRETE DASE - SEE DET 2
	PS-49-C018	4"	10-5-8	5-3/8"	5-57-8"	NEW CONCRETE BASE - SEE DET 5		PS-	44-C018) 8"	1'-3"	EXISTING CONCRETE BASE
((PS-34-C018)	3"	9-5/16"	4-5/16"	4-5/16"	EXISTING CONCRETE BASE						
>	(PS-30-E50221)	3"	9-5/16"	4-5/16"	4-5/16"	EXISTING CONCRETE BASE						
	PS-31-E50221	3"	9-5/16"	4-5/16"	4-5/16"	EXISTING CONCRETE BASE		(
	(PS-32-E5022)	3"	9-5/16"	4-5/16"	4-5/16"	NEW CONCRETE BASE - SEE H-2-88770)				
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ECN 632885 SHEET 7 OF 8

DWG H-2-79634

MODIFY AS SHOWN BELOW

	SUPPORT NO	LINE SIZE	DIM C	DIM D	DIME	DIM (F)	
	(PS-17-W105)	8"	1'-4 <u>7</u> "	11 <u>7</u> "	10''	1'-6"	
	(PS-21-W105)	12"	1'-9 <u>3</u> "	1'-4 <u>3</u> "	1'-2 <u>5</u> ."	1'-4 <u>1</u> "	
	(PS-22-W105)	12"	1'-7 <u>5</u> "	1'-2 <u>5</u> "	1'-2 <u>-5</u> "	1'-8 <u>3</u> "	
	(PS-23-W105)	12"	1'-7 <u>5</u> "	1'-2 <u>5</u> "	1'-2 <u>5</u> "	5 <u>3</u> "	
	(PS-27-W105)	12"	1'-7 <u>5</u> "	1'-2 <u>-5</u> -"	1'-2 <u>5</u> "	1'-6 <u>3</u> "	
	(PS-28-W105)	12"	1'-7 <u>5</u> "				
	(PS-31-W105)	6"	1'-1"	8"	8"	1'-5-1"	
					С	1 0 7	
	3-32-W105	6'	1'-1''	8"	, ,	$10\frac{1}{4}$ "	
$\left(\right)$	PS-32-W105		1'-1'' 1'-4 <u>7</u> ''	8" 11 <u>7</u> "	10"		
(6'	1'-1'' 1'-4 <u>7</u> ''	8" 11 <u>7</u> "	10" 1' <u>5</u> "	$10\frac{1}{4}$ " AS REQD 2'-4 $\frac{1}{8}$ "	
$\left(\right)$	(PS-38-W105)	6' 8''	1'-1''	8" 11 <u>7</u> "	10" 1'5-"	$10\frac{1}{4}$ " AS REQD 2'-4 $\frac{1}{8}$ "	
$\left(\right)$	(PS-38-W105) (PC-39-W105)	6' 8'' 12''	1'-1'' 1'-4 <u>7</u> '' 1'-7 <u>5</u> ''	8" 11 <u>7</u> " 1'-2 <u>5</u> "	10" 1' <u>5</u> "	$10\frac{1}{4}$ " AS REQD 2'-4 $\frac{1}{8}$ ")
	PS-38-W105 PS-39-W105 PS-43-W105	6 8" 12" 12"	1'-1'' $1'-4\frac{7}{8}''$ $1'-7\frac{5}{16}''$ $1'-7\frac{5}{16}''$	8" 11 <u>7</u> " 1'-2 <u>5</u> " 1'-2 <u>5</u> "	10" 1'-5" 1'-2 <u>5</u> "	$10\frac{1}{4}$ " AS REQD $2'-4\frac{1}{8}$ " $10\frac{5}{8}$ ")
	PS-38-W105 PS-43-W105 PS-43-W105 PS-30A-W105	6 8" 12" 12" 8"	1'-1'' $1'-4\frac{7}{8}''$ $1'-7\frac{5}{16}''$ $1'-7\frac{5}{16}''$ $1'-4\frac{7}{8}''$	$8''$ $11\frac{7}{8}''$ $1'-2\frac{5}{16}''$ $1'-2\frac{5}{16}''$ $11\frac{7}{8}''$	10" 1'-2 <u>5</u> " 1'-2 <u>5</u> " 10"	$10\frac{1}{4}"$ AS REQD 2'-4 $\frac{1}{8}"$ 10 $\frac{5}{8}"$ 1'-3 $\frac{1}{4}"$	



UNREVIEWED S SCREENING/DETI		-			Page 1 of 5 USQ Tracking No. TF-96-0532	
	(10)				Rev. 0	
AREA: [X]	East [] West	[] General				
Facility: []		[] DST [] Other	[] SST	[X] LERF		
ECN No. 63	2885/632887		PCA No.			
Work Pkg N	0.		Other (Spe	cify)		
TITLE: LER	F BASIN 43 SPOOL	PIECE ADDITIO	N			
	of the Proposed Ac ECE WILL BE ADDEI INSTALLING HEAT 1			CENCL BURG	EXTENDING THE CAT	сн
BETWEEN VAI JUST DOWNS' SECTION OF CONNECTING SECTION BE' EXISTING C/ DETAILS ABO THE 242-A BASINS WHI EITHER OF OF THE LER	LVE 60M-43P TO JU TREAM OF VALVE 60 PIPE FROM VALVE 60 8" EVAP COND-PO TWEEN 60M-43L ANI ATCH BASIN OR THI OUT THE PIPING AN EVAPORATOR TO PU LE THE EFFLUENT THE FFRUING TW	JST DOWNSTREAM M-43A OVER TO HV-43-5 TO 3"- 5005-M17 TO 8" 0 8"-60M-006-M1 0 8"-60M-006 M1 E NEWLY CONSTRU RANGEMENT PLEA IP ITS PROCESS IREATMENT FACIL 0 RASINS SIMUL	OF VALVE HV-4 VALVE 60M-43L 60M-001-M17, '- EVAP COND-F 7. ALL THESE JCTED ADDITION ASE SEE ECN 63 CONDENSATE DJ ITY IS ABLE J TANFOUSIY. TH	3-8. ANOTH . THERE IS ALONG WITH C5010-M17. : LINES ARE I TO THE CAT 2885. THE RECTLY TO A CO PUMP PROC UIS USO IS B	S SECTION OF PIPE ER PIECE WILL BE PIECE THAT WILL A SECTION OF PIPE A FINAL PIECE A OVER EITHER THE CH BASIN. FOR FU SPOOL PIECE ENABL NY OF THE THREE L ESS CONDENSATE FR OUNDED BY THE BOU T BOTH THE 242AL-	ADI ADI DDS IRTI ES ERI
THE 242AL-	IS USQ COVERS TH 43 CATCH BASIN II D HEAT TRACE TO	CLUDING ADDING	ALL ASPECTS	T ARE BEING OF THE MODI	MADE TO THE PIPI FICATION, THE VAL	NG Ve:
Authorizatio	n Basis: LERF FSA	R WHC-SD-W105-S	5AR-001 REV 0-	D		
	This modificat in the LERF FSAR		ffect the Auth	norization B	asis of the LERF	as
References	None					
USQ Screen	ing:					

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ECN	632885 Page 86 of 8
	Page 2 of 5
UNREVIEWED SAFETY QUESTION SCREENING/DETE (Continued)	RMINATION FORM USQ Tracking No. TF-96-0532
	Rev. 0
A. Does the PROPOSED ACTIVITY represent a chang AUTHORIZATION BASIS?	e to the facility as described in the
[] No [X] Yes [] N/A	· · · · · · · · · · · · · · · · · · ·
Basis: The addition of the spool piece that Basin 242AL-43 does represent a change to t Authorization Basis, WHC-SD-W105-SAR-001, R	he facility as described in the
B. Does the PROPOSED ACTIVITY represent a chang AUTHORIZATION BASIS?	e to procedures as described in the
[X] No [] Yes [] N/A	
Basis: The proposed change is a physical mo procedures for piping described in the LERF	
C. Does the test or experiment represent a test or ex BASIS documentation?	periment not described in the AUTHORIZATION
[] No [] Yes [X] N/A	
Basis: This modification does not represent	a test or experiment. (see background)
D. Does the PROPOSED ACTIVITY or REPORTABLE C	DCCURRENCE, impact:
 OSRs or IOSRs? Approved IOSR Compliance Implementation Plan 	17
[X] No [] Yes [] N/A	
Basis: There are no IOSR'S associated with deal strictly with the chemical composition address piping. Therefore, no OSRs are imp	and verification sampling and do not
E. Does the REPORTABLE OCCURRENCE or PIAB inv deficiencies in the AUTHORIZATION BASIS?	olve analytical errors, omissions, and/or
[] No [] Yes [X] N/A	
Basis: This is a proposed change and no rep involved.	ortable occurrences or PIABs are

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ECN \$32885	rage is of 8
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UNREVIEWED SAFETY QUESTION SCREENING/DETERMINATION F	
(Continued)	TF-96-0532
	Rev. 0
USQE No. 1 <u>Terese</u> <u>A. Campbell</u> USQE No. 2 Print Name Signature Signature Date Date Date Date Signature	MA White Fint Name Alt <u>7,26/96</u> Dave
IF "YES", USGE CONTINUE WITH DETERMINATION BELOW	
USO DETERMINATION:	
1. Could the PROPOSED ACTIVITY or USQ ISSUE significantly incr of an accident previously evaluated in the AUTHORIZATION BAS	
[X] No [] Yes/Maybe	
Basis: The accidents that were evaluated in the Authori spill, and splash occurrences. The above listed modifi frequency of accidents evaluated in the authorization b bounds this change is the spray leak. Assumptions made are discussed in sections 9.1.1, and the added piping w requirements imposed on the initial system. Per Attach IV, Section 5.4, Rev. 9, "an increase in frequency exis would result in 1) an increase in the predicted freque a higher frequency category, or, if a specific freq AUTHORIZATION BASIS, 2) an increase in the predicted fr greater than or equal to a factor of 15." The frequency to be 10 ⁻⁵ event per year as stated in section 9.1 of th change could increase the frequency slightly due to the increase is not substantial and could not result in an would exceed a factor of 15. Therefore, no significant possible.	cations will not affect the asis. The accident that for this accident analysis ill meet all of the ment J of WHC-IP-0842 Volume ts if the proposed activity ncy of a reported accident to uencies are reported in the equency with a change of y of this accident is stated he SAR. While the proposed additional pipe length, the increase the frequency which
2. Could the PROPOSED ACTIVITY or USQ Issue significantly incre accident previously evaluated in the AUTHORIZATION BASIS?	ase the consequences of an
[X] No [] Yes/Maybe	
Basis: The above listed facility modifications do not i any accident previously evaluated in the LERF SAR chapt consequences of a spill/splash, basin evaporation and s accident scenario relevant to the above modifications i approximately 20 feet of pipe will not affect the conse accident.	er 9. The SAR evaluates the pray leak. The applicable s the spray leak and adding
A-6001-203 (06/96) GEF289	

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•	ECN 632885	Page od of 8
		Page 4 of 5
υ	NREVIEWED SAFETY QUESTION SCREENING/DETERMINATION FORM (Continued)	USQ Tracking No. TF-96-0532
		Rev. 0
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3.	Could the PROPOSED ACTIVITY or USQ ISSUE significantly increase th of a malfunction of EQUIPMENT IMPORTANT TO SAFETY previously en AUTHORIZATION BASIS?	
	[X] No [] Yes/Maybe	
	Basis: These modifications will in no way increase the frequer malfunction of equipment previously evaluated in the Authoriz consequences of credible bounding accidents and abnormal occu evaluated and found to be within guideline values for non-saf Therefore, no specific equipment or instrumentation is necess there is no ITS equipment required at LERF (see section 4.3.3	ation Basis. The rrences have been ety class equipment. ary. This means that
4.	Could the PROPOSED ACTIVITY or USO ISSUE significantly increase the malfunction of EQUIPMENT IMPORTANT TO SAFETY previously evalual AUTHORIZATION BASIS?	
	[X] No [] Yes/Maybe	
	Basis: There is no safety class equipment at the LERF and thu probabilities or consequences of accidents involving ITS equi 4.3.3 of the LERF SAR).	
5.	Could the PROPOSED ACTIVITY or USQ ISSUE create the possibility of type than any previously evaluated in the AUTHORIZATION BASIS?	an accident of a different
	[X] No [] Yes/Maybe	
	Basis: By performing these modifications it is not possible to has not been previously evaluated in the LERF SAR. The LERF types of credible accidents associated with the facility spil evaporation and sprays. The applicable accident to the modif leak and it has already been evaluated. These are listed in and 9.4.1.5. The LERF SAR also examined several other types them incredible and therefore no analysis was performed. The examined and deemed incredible are discussed in section 9.1 o	SAR evaluates three ls/splashes, basin ication is the spray the sections 9.3.1.5 of accidents and deemed se accidents that were
6.	Could the PROPOSED ACTIVITY or USQ ISSUE create the possibility of EQUIPMENT IMPORTANT TO SAFETY of a different type than any prev AUTHORIZATION BASIS?	
	[X] No [] Yes/Maybe	
	Basis: As stated above, the LERF does not contain any ITS equinew scenarios are possible. (See section $4.3.3$ of the LERF S	

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		ECN	632885	Page	80 of 3
				Pa	ge 5 of 5
UNREVIEWED SAFETY QU	JESTION SCREENING/E (Continued)	DETERMI	NATION FORM	USQ Trac TF-96-0	
				Rev. 0	
7. Could the PROPOSED a defined in the AUTHOR		JE reduce	the margin of s	afety for an	y OSR/IOSR
[X] No [] Yes/May	rbe				
Basis: The only LERF Limits and the assoc affect the radioact margin of safety wil	ciated surveillance ive constituent conc	requiren entratio	ent. The aboven in the LER	ve modific F basins.	ations can Therefore
8. Does the PROPOSED A compensatory measure					(including
[X] No [] Yes/May	/be				
Basis: These modific are no IOSRs or imp revised TSR/OSR is n	lementation plans as	e bounda sociated	ry defined by with the LER	the LERF F. Theref	SAR. There ore a new o
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Print Name	A Campbell	-	Print Nam	white	
Stanature	7-26-96 Date	Signatu	<u>~70 / X</u>	\$	7/26/
	PRC	REVIEW			
Meeting No.:	Date			-	
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APPENDIX 4B

DETAILED DRAWINGS FOR THE 200 AREA EFFLUENT TREATMENT FACILITY CONTAINER STORAGE AREA AND TANK SYSTEMS

Drawings of the secondary containment systems for the ETF containers, and tanks and process units, and for the Load-In Tanks are summarized in Table 4B-1. Because the failure of the secondary containment systems could lead to the release of dangerous waste into the environment, Engineering Change Notices (ECNs) which affect the secondary containment systems will be submitted to the Washington State Department of Ecology, as a Class 1, 2, or 3 permit modification, as required by WAC 173-303-830.

Table 4B-1. Drawing of Effluent Treatment Facility and Load-In Station Secondary Containment Systems

ETF Process Unit	Drawing Number	Outstanding ECNs	Drawing Title
Surge Tank, Process/Container Storage Areas and Trenches - Foundation and Containment	H-2-89063, Rev. 3	None	STRUCT - Foundation and Grade Beam Plan (Sheet 1)
Sump Tank Containment	H-2-89065, Rev. 3	None	STRUCT - Foundation, Sections and Detail (Sheet 1)
Verification Tank Foundation and Containment	H-2-89068, Rev. 3	None	STRUCT - Verification Tank Foundation (Sheet 1)
Load-In Facility Foundation and Containment	H-2-817970, Rev. 1	None	Structural - ETF Truck Load-i Facility Plans and Sections (Sheet 1)
Load-In Facility Foundation and Containment	H-2-817970, Rev. 1	None	Structural - ETF Truck Load-i Facility Sections and Details (Sheet 2)

P&ID - piping and instrumentation diagram.

STRUCT - architectural/structural diagram.

The drawings identified in Table 4B-2 provide an illustration of the piping and instrumentation configuration for the major process units and tanks at the ETF, and the Load-In Tanks. Drawings of the transfer piping systems between the LERF and ETF, and between the Load-In Station and the ETF also are presented in this table. These drawings are provided for general information and to demonstrate the adequacy of the design of the tank systems. An update to these drawings and drawings identified in Table 4B-1 will be provided annually to the Washington State Department of Ecology.

12	· · · · · · · · · · · · · · · · · · ·			
13	ETF Process Unit	Drawing Number	Outstanding ECNs	Drawing Title
14	Load-In Facility	H-2-817976, Rev. 1	None	P&ID - ETF Truck Load-In Facility (Sheet 1)
15	Surge Tank	H-2-89337, Rev. 6	ECN-636749	P&ID - Surge Tank System (Sheet 1)
16	UV/Oxidation	H-2-88976, Rev. 6	None	P&ID - UV Oxidizer Part 1 (Sheet 1)
17	UV/Oxidation	H-2-89342, Rev. 6	None	P&1D - UV Oxidizer Part 2 (Sheet 1)
18	Reverse Osmosis	H-2-88980, Rev. 6	None	P&ID - 1st RO Stage (Sheet 1)
19	Reverse Osmosis	H-2-88982, Rev. 5	ECN-636799 ECN-641721	P&ID - 2nd RO Stage (Sheet 1)
20	IX/Polishers	H-2-88983, Rev. 5	ECN-636799	P&ID - Polisher (Sheet 1)
21	Verification Tanks	H-2-88985, Rev. 7	None	P&ID - Verification Tank System (Sheet 1)
22	ETF Evaporator	H-2-89335, Rev. 7	None	P&ID - Evaporator (Sheet 1)
23	Thin Film Dryer	H-2-88989, Rev. 8	ECN-641718	P&ID - Thin Film Dryer (Sheet 1)
24 25	Transfer Piping from LERF to ETF	H-2-88768, Rev. 1	None	Piping Plan/Profile 4"-60M-002-M17 and 3"-60M-001-M17 (Sheet 1)
26 27 28	Transfer Piping from Load-In Facility to ETF	H-2-817969, Rev. 1	w291-015	Civil - ETF Truck Load-In Facility Site Plan (Sheet 1)

Table 4B-2.	Drawings	of	Major	Process	Units	and	Tanks	at	the	Effluent	Treatment	Facility
				and	Load-	In Si	tation	•				

P&ID - piping and instrumentation diagram.

STRUCT - architectural/structural diagram.

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ENGINEERING CHANGE NOTICE ESSENTIAL 1. €CN 636749 Page 1 of Proj. ECN CPF 18 3. Originator's Name, Organization, MSIN, 2. ECN Category 4. USQ Required? S. Date (mark one) and Telephone No. L. L. Lin/32200/\$6-72/372-2759 01-13-97 [] Yes [X] No Supplemental 0 **Direct Revision** ú 6. Project fitle/No./Work Order No. 7. Bldg./Sys./Fac. No. 8. Approval Designator Change ECN C H2O2 Delivery to Surge Tank and 2025E/60D, 60F & NA Temporary G Standby C **ČIP** Tank 60A Supersedure tx1 9. Document Numbers Changed by this ECN 10. Related ECN No(s). 11. Related PO No. Cancel/Void t1 (includes sheet no. and rev.) H-2-89350, sh 1, rev 6 636717 . None H-2-89343, sh1, rev 5 H-2-89337, sh1, rev 5 12a. Modification Work 12b. Work Package | 12c. Modification Work Complete 12d. Restored to Original Condition (Temp. or Standby ECN only) No. NA [X] Yes (fill out Blk. EL-96-00424 126) .25-9 No (NA BLKs. 126, Design Authority/Cog. Engineer Authority/Cog. Engineer 12c, 12d) Signature & Date Signature & Date 13a. Description of Change 13b. Design Baseline Document? [X] Yes [] No This ECN supersedes ECN 636717 in its entirety. Install new chemical injection pump to deliver H202 to Surge Tank and CIP tank. H202 will be used for biological control in the Surge Tank and for sanitizing solution makeup in the CIP tank. Changes are depicted in the clouded portion of the attached ECN continuation pages. (Continued on page 3) 39 3 14a. Justification (mark one) [] [X] [1 Facility Deactivation જે Criteria Change [] Design Improvement Environmental Design Error/Omission As-Found ٢1 Facilitate Const ſ١ Const. Error/Omission 14b. Justification Details Change is required to provide biological fouling control in the Surge Tank water and ς associated downstream piping and process components. It also provides a safe way of 2) adding H2O2 to the CIP tank. n 15. Distribution (include name, HSIN, and no. of copies) E. A. McNamar, S6-72, 1 N. J. Sullivan, S6-72, 1 1807 JAN A. K. Yoakum, S6-71, 1 J. E. Geary, S6-71, 1 DATE Ivan Papp, S6-72, 1 HAMFORD L. L. Lin, S6-72, 1 ETF Tech Library, S6-72, 1 ID: STA: RELEASE Station 4, 1 5 30 Station 30. 1

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16. Design	17. Cost Impact	t NA		Page	2 of	<u> </u>	B. Schedule Impact	t (days)
Verification Required	ENGI	NEERING	CO.	NSTRUCTION			NA	
[X] Yes	Additional	[] \$	Additional	<u> </u>	5	1	mprovement	7.00 []
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	ffected by the ch	ange described i	in Block 13. Ent	er the affe	cted do	cument	number in Block	n Side 1) 20.
SDD/DD	[NA]		Stress Analysis	[NA]]		nk Callbration Manual	[NA]
Functional Design Criteri	а <u>Ш</u>		Design Report	[]			aith Physics Procedure	цı
Operating Specification	<u>0</u>]		control Drawing	[]			ares Multiple Unit Listi	<u> </u>
Criticality Specification	Ç 1		tion: Procedure	· []			st Procedures/Specifica	tion [7]
Conceptual Design Repo	"[]		tion Procedure	(f)			mponent Index	[X]
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Procurement Spec.	(1	-	ing Instruction	[]			mputor Software	¢
Vendor Information	-(1		ing Procedure	[X]			etric Circuit Schedule	()
OM Manual	1		ional Safety Requireme	ent MA			RS Procedure	ង្រ
FSAR/SAR	. 11	IEFD Dr	rawing	[X]		Pro	cess Control Manual/P	^{tan} []
Safety Equipment List	- fi	Cell An	rangement Drawing	[AYA		Pro	cess Flow Chart	đi
Radiation Work Permit	li li	Essenti	al Material Specification	n [j		Pu	rchase Regulation	ťh
Environmental Impact St	latement ET	Fac. Pro	oc, Samp, Schedule	đi		Τĸ	kler File	đ
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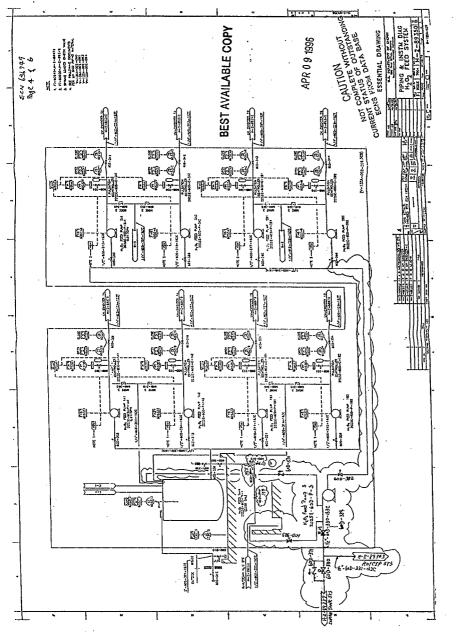
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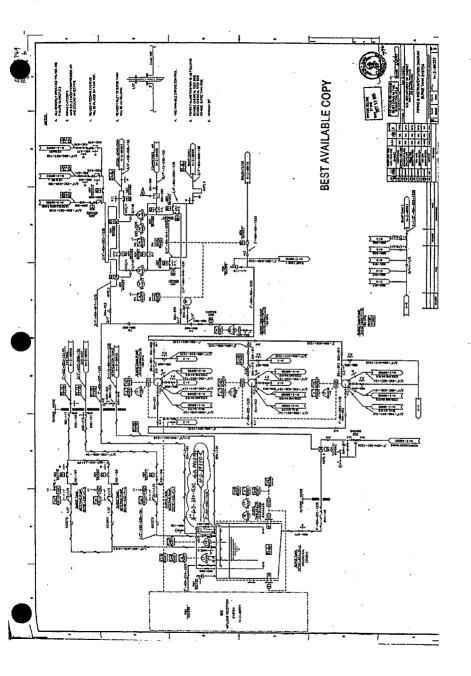
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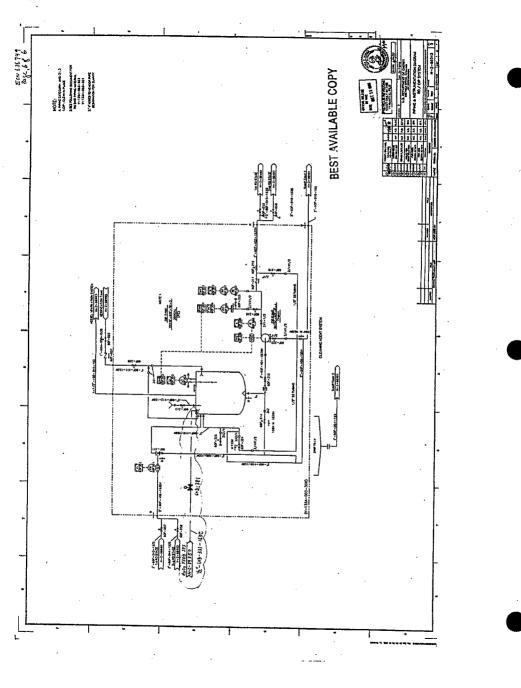
ENGINEERING CHANGE NOTICE CONTINUATION SHEET	ECN 636749
ENGINEERING CHANGE NOTICE CONTINUATION SHEET Page 3 of 6	Date 1/13/97
(Continued from page 1 of this ECN)	
Install Pulsatron electronic metering pump, model LPH7-SA-ATS4, capac psi for 60D-P-3.	ity 10 gph at 35
Check valve 60D-370 shall be 1/2", SS, 40 psi cracking pressure; chec shall be 1/2", SS, 60 psi cracking pressure.	k valve 60D-371
Piping shall be 1/2", SS (1/2"-60D-330-163C, 1/2"-60D-331-163C). Tub sloped to avoid low point liquid traps.	oing run shall be
All new valves shall be 1/2", SS, 150 psi, ball valves. Support valv	ves as necessary.
Tubing penetration at 60F-TK-3 shall be within the NE quadrant on top	of the tank.
Tubing penetrations at polyethylene tanks (60D-TK-1 and 60F-TK-3) sha SS bulkhead connectors or Engineering approved equal.	ll be sealed with
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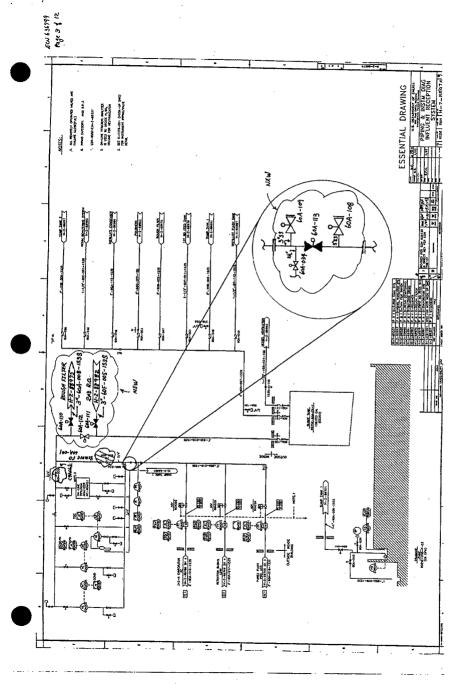


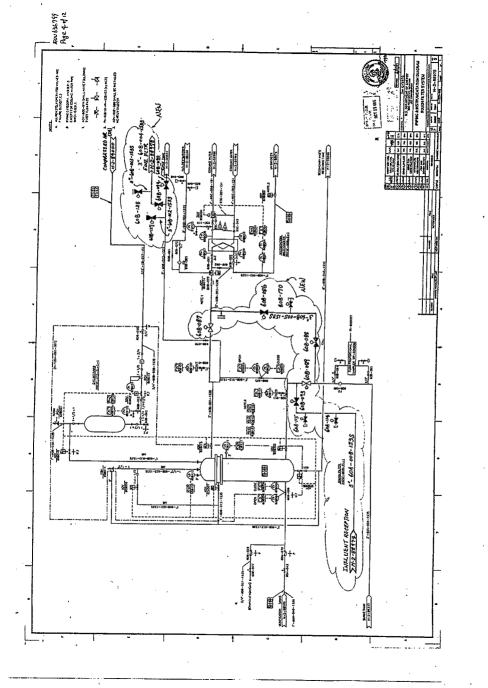
Page 1 of 12

2. ECN Category (mark one)	3. Originator's Nam and Telephone No	e, Organization, MSIN,	4. USQ Requ	ired?	5. Date
Supplemental []		S6-72, 372-2759	[] Yes [X] No	4/14/97
Direct Revision []	Project Title/No	/Work Order No.	7. Bldg./Sy	s./Fac. No.	8. Approval Designator
Change ECN [X] Temporary []	ETF GW	Piping Mods	2025	Ē,	NA
Standby [] Supersedure [x]	9. Document Numbers (includes sheet)	Changed by this ECN	10. Related	ECN No(8).	11. Related PO No.
Cancel/Void []		Block 13	FCN-6	36760	None
			ECN-6	36797 32910	None
12a. Modification Work	12b. Work Package	12c. Modification Work (12d. Restor	ed to Original Condi-
[X] Yes (fill out Blk.	но. E29277			tion (Temp. NA	or Standby ECN only)
12b)		·	· · · · ·		
12c, 12d)		Design Authority/Cog. Signature & Da		Design A S	uthority/Cog. Engineer ignature & Date
13a. Description of Chang		13b. Design Baseline i	Document? [] No
This ECN supersede	es ECN-636760 and 1910.	ECN-636797 in the	ir entire	ty. This	ECN also changes
Changes are depict		d portions of the	attached	continuat	ion pages.
Affected drawings					
H-2-88974, Rev 7, H-2-88975, Rev 5,					
●H-2-88978, Rev 5,					
H-2-89332, Rev 6,					
#H-2-88982, Rev 5,	sht 1, P&ID 2nd	RO Stage			
•H-2-88983, Rev 5,					
#H-2-88984, Rev 6,			D		
●H-2-88991, Rev 5, ●H-2-88986, Rev 4,			0110		
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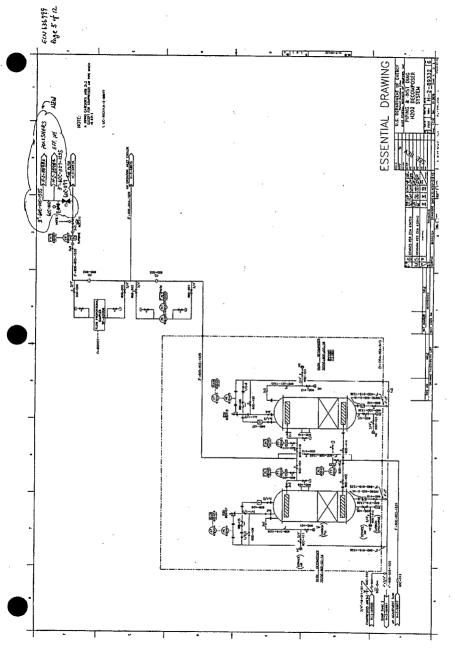
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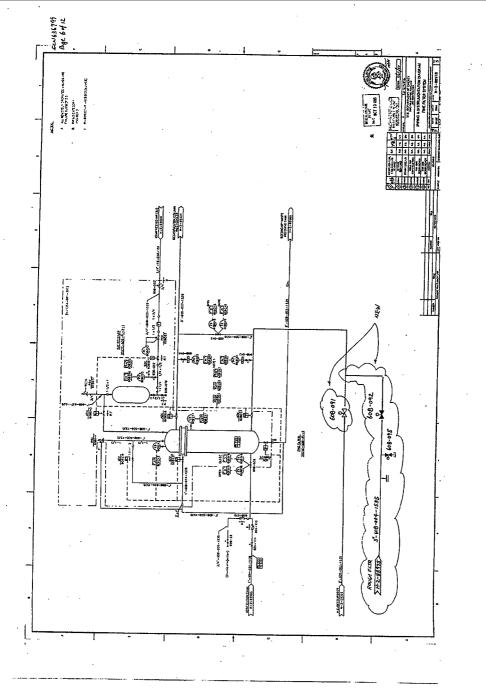
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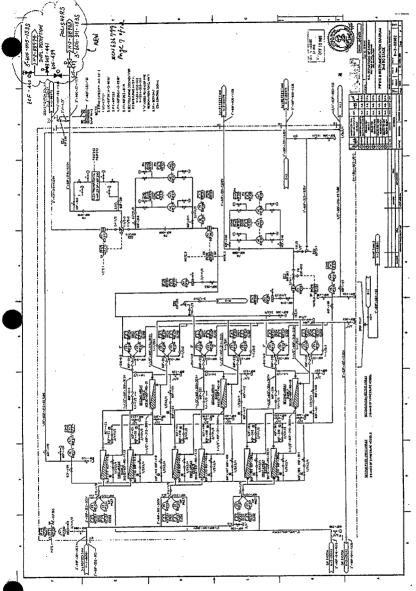


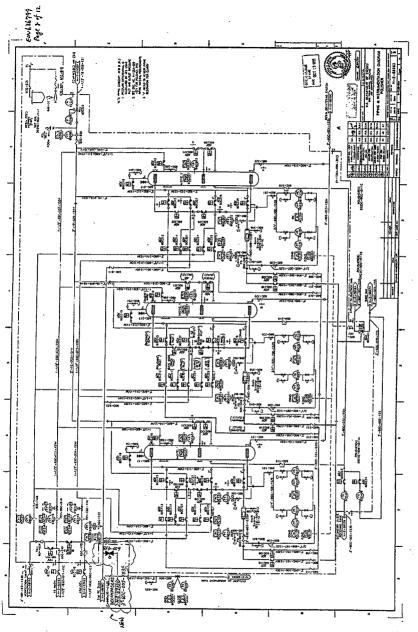


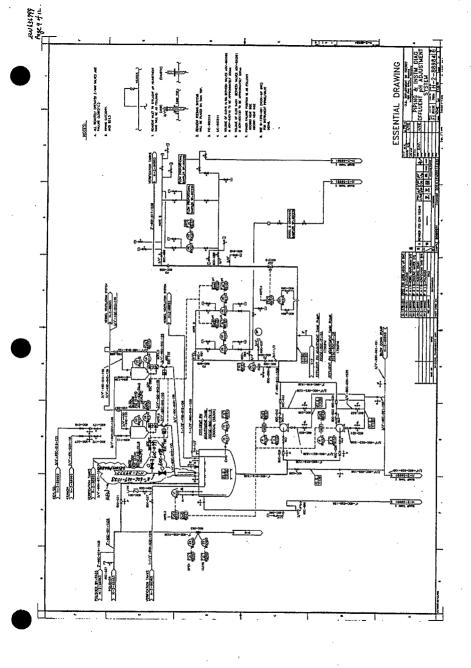
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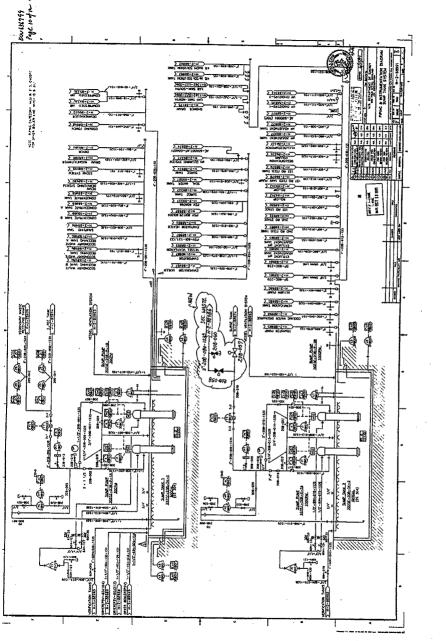


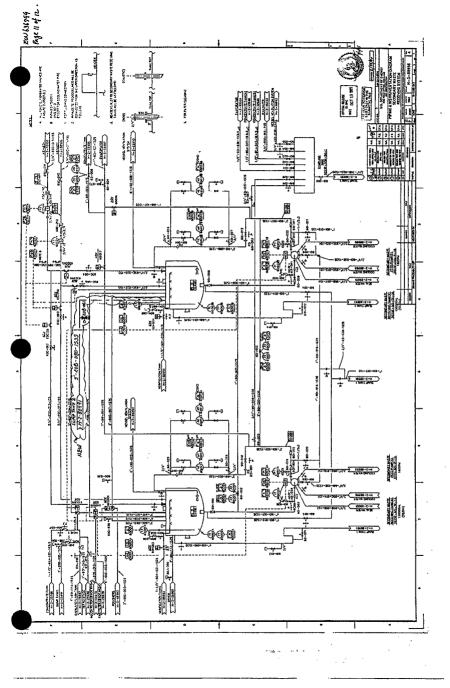


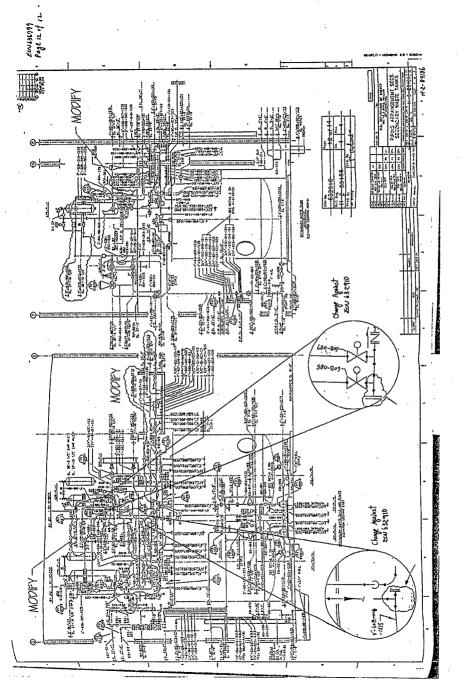












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			Ell P.A.				
			HANGE NOTICE	SSEN	ITIA	1. ECN 64	1718
	CPF 18	ENGINEERING	MANGE NO HOE	Page	1 of <u>6</u>	Proj. ECN	
L	2. EEN Category (mark one)	 Originator's Name and Telephone No. 	, Organization, MSIN,	4. USQ Requ	ired?	5. Date	
	Supplemental DX		0/\$6-72/372-3592	[] Yes [X] NO	05/29/9	7
	Direct Revision Change ECN	6. Project Title/No.		7. Bldg./Sy	s./Fac. No.	8. Approval Des	gnator
	Temporary [] Standby [] Supersedure []	PRESS XMTR ISO	DID ACTUATION AND L VALVE LOCATION	2025	E/60J	. N/A	
	Cancel/Void []	 Document Numbers (includes sheet n 	Changed by this ECN	10. Related	ECN No(s).	11. Related PO H	io.
		H-2-88989,		N/	'A	N/A	· [
	12a. Modification Work	12b. Work Package No.	12c. Modification Work	Complete		ed to Original Co or Standby ECN o	
	[] Yes (fill out Blk. 12b)	N/A	N/A				
	[X] No (NA BLKS. 12b, 12c, 12d)		Design Authority/Cog. Signature & Da			uthority/Cog. Eng ignature & Date	ineer
	13a. Description of Charge Valve 60J-145 was d valve as previously depicted. SEE CLOUDED AREA	liscovered to be indicated. Pr	oper routing of MC	e to PT-6	0J007 ratl	$\frac{1}{\sqrt{2}}$ $\frac{8}{\sqrt{3}}$ her than a bl olenoid valve	97 eed 25
•							
30	· ·						
1, 5, 16,	14a. Justification (mark o Criteria Change [] As-Found [X] 14b. Justification Details	Design Improvement Facilitate Const	[] Environmental [] Const. Error/C	[] mission []		ty Deactivation	
514. 3, 4, 5, 16,30	This ECN corrects t		"as-found" conditi	ons.	•		
	15. Distribution (include DE SCULLY, S6-72, 1 NJ SULLIVAN, S6-72, RJ HUTH, S6-72,1 SH CARMICHAEL, S6-7 DL TUBBS, S6-74,1 JL VIGUE, S6-74,1	JE GEA 1 BS DAR DP NEL 74,1 DA VAS	f copies) RY, S6-72, 1 LING, S6-72,1 SEN, S6-72,1 QUEZ, S6-74,1 TS, S6-72,1		DATE: STA: 3.0	RELEASE STANP	17 10: 25

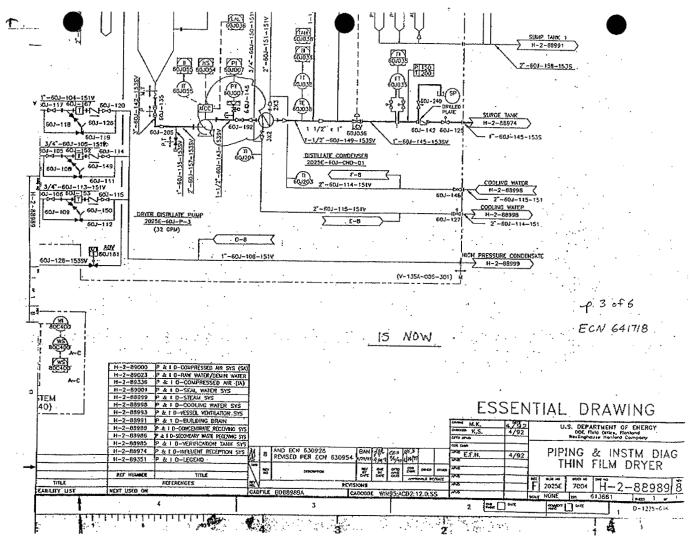
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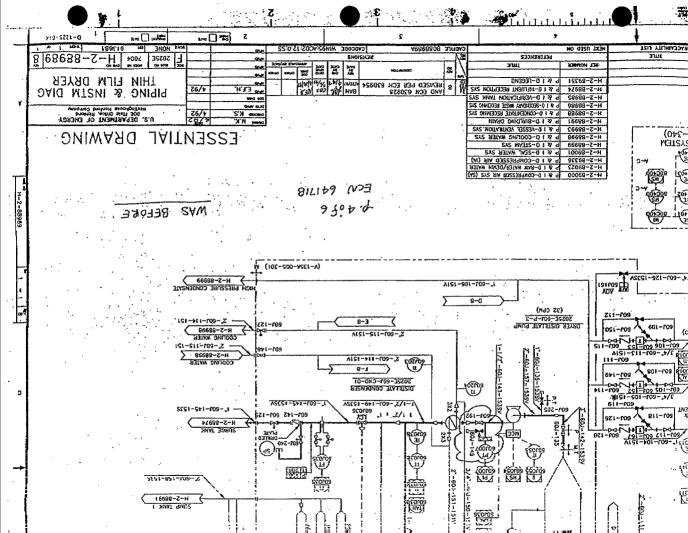
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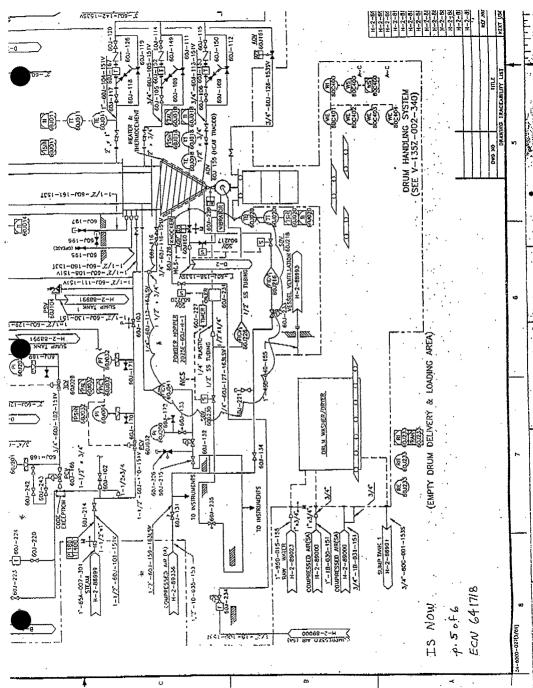
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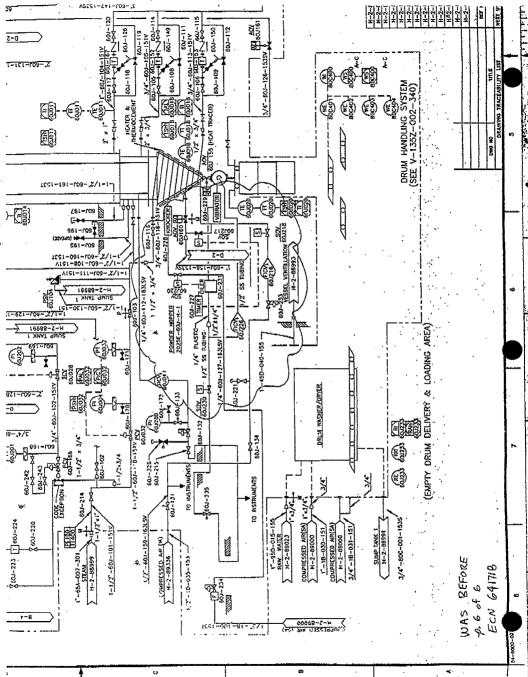
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C)	AQUACCUMA	CHANC	SE NOTIC		P	ige 2 of 6	6417	18 -	
16. Design Verification Required	17. Cost Impa EXC	ict SINEERING	N	Ά _{coi}	ISTRUCTIC	או	18. Schedule I	impáct (day	2)
[] Yes	Additional	٢٦	\$	Additional	ri.	s .	Improvement	r1 .	
EST NO	Savings	ñ	ŝ	Savings	ĥ	ŝ	Delay	T	
19. Change Impact H	Review: Indicate Indicate []	LJ. te the re change de	Scribed in Seimic/St Strect/Des Interface C Cellbration Installation Maintonan Englnesrin Operating Operating Operating Operating IEFD Draw Cell Arrang Escential M	ents (other th Block 13. Ent reve Analysis Lign Report Control Drawing Procedure or Procedure or Procedure Instruction Procedure al Safety Requirement Ing pement Drawing Autorial Specification	er the a [[[[[[[[[[[[[[[[[[[ngineering doc ffected docume]]]]]]]]]]]]]]]]]]]	uments identif ent number in B Tank Calibration M. Maath Physics Prac Sparse Multiple Uni Test Procedure/Sp Component Inder ASME Coded itam Murnen Factor Coni Computer Software Electric Circuit Sch (CRS Procedure Process Control Ma Process Row Chart Purchase Requirtic	Lock 20. anual cadure it Listing pocification sideration sideration sedule anual/Plan	
	atement []		Fac. Proc.	Samp. Schedule	r.	1	Tickler File		ři I
Environmental Impact St									11 1
Environmental Impact St Environmental Report	1.1 L 1		Inspection	Plan	ĩ	1			rn i
Environmental Report Environmental Permit 20. Other Affected	Documents: (No the signing ora:	DTE: Doc	Inventory A	Adjustment Reques	L. Not be r]] evised by this	ECN.) Signatu	ures below	[] []
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		E	SSEN	AITA	1. ECN 6417
CPF 18	ENGINEERING	CHANGE NOTICE		1 of _2	***************************************
2. ECN Category	3. Originator's Name	e, Organization, MSIN,	4. USQ Reca	lired?	5. Date
(mark one) Supplemental [] Direct Revision []	E. A. McNamar, 373-3465		[] Yes [5-22-97
Change ECN [X] Temporary [] Standby []	6. Project Title/No.	/Work Order No. Bed Orifices		's./Fac. No. E/60F	8. Approval Designato N/A
Supersèdure [] Cancel/Void []	9. Document Numbers (includes sheet r H-2-88981, H-2-88982	Changed by this ECN	10. Related	TECN No(S).	11. Related PD No. N/A
12a. Modification Work [X] Yes (fill out Blk.	12b. Work Package No. EL-96-00505	12c. Hodification Work I	L	12d. Restor tion (Temp.	ed to Original Condi- or Standby ECN only) N/A ^
12b) []No (NA Biks. 12b, 12c, 12d)		Design Authority/Cog. Signature & Da		Design Au	uthority/Cog. Engineer
13a. Description of Change		13b. Design Baseline			No
		60F-014* to F0-60F	-012* FO	-60E-01/A	to F0_60F012A
F0-60F-014B to F0-(60F012B. F0-60F-	60F-014* to F0-60F 014C to F0-60F012C	-012*, FO and FO-6	-60F-014A 0F-015 to	to FO-60F012A, FO-60F-012
FO-60F014B to FO-(14a. Justification (mark c Criteria Change [X]	50F012B F0-60F- one) Design Improvement	014C to FO-60F012C	and F0-6	0F-015 to	FO-60F-012
FO-60F-014B to FO-6 14a. Justification (mark of Criteria Change [X] As-Found [] 14b. Justification Details	50F012B, F0-60F- one) Design Improvement Facilitate Const	014C to F0-60F012C	and F0-6	OF-015 to Facilit	F0-60F-012

A-7900-013-1

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E	GINEERING	CHANG	E NOTIO)E			•	1. ECN (us	se no. from	
						Page 2	_	6	4172	
16. Design Verification Required	17. Cost Impe EN	set GINEERING	ł	01A co	NSTRUCT	ION	18	. Schedule I	impact (day N/A	rs)
[X] Yes	Additional	r ı	\$	Additional	Ľ	1\$	Im	provement	[]	
[] No	Savings	ñ	Ś	Savings	Γ	1.\$	De	lay .	ก้า	
19. Change Impact i	Review: Indica	te the re	lated docu	ments (other th	an the	engineer	ing docume	ents identif	ied on Side	e 1)
that will be a SDD/DD	ffected by the	change de	scribed in	Block 13. Ent	er the	affected	document	number in B	lock 20.	
	Ĺ			tress Analysis				k Celibration M		[]
Functional Design Criteri		•		lign Report		3		Ith Physics Pro		[]
Operating Specification	[]			Control Drawing		[]	-	res Multiple Un		[]
Criticality Specification	[]			Procedure		[]		t Procedures/Sp	Hecification	[]
Conceptual Design Repo	L J			Procedure		[]		nponent Index		[]
Equipment Spec.				ce Procedure]		AE Coded Item		[]
Const. Spec.	NH []		-	g Procedure		[]		nan Factor Con		[]
Procurement Spec.	[]			Instruction		[]		nputer Software		[]
Vendor Information	[]			Procedure		[]		tric Circuit Sch	edule	[]
OM Manual	[]			el Safety Requirem]		S Procedure		[]
FSAR/SAR	[]		IEFD Draw	· .		[]		ess Control Ma		[]
Safety Equipment List	[]			gement Drawing		[]		ess Flow Charl		[]
Rediation Work Permit	[]			Aaterial Specification				hase Requisitio	m	[]
Environmental Impact St	L J			Samp. Schedule	1	[]	Tick	ler file		[]
Environmental Report	[]		Inspection]	[]			•	[]
Environmental Permit	[]		inventory	Adjustment Reques	n]]				[]
	nber/Revision V/A		Doci	ment Number/Re	vision		Di	ocument Numb	er Revisio	n
24 4					<u> </u>			•••••••••		
21. Approvals	Signature	A -:		Date			Signature	e		Date
Design Authority E Cog. Eng. E. A. Mo	E. A. McNamar E.	H.m.	loom	5-22-17	-	Agent	c, A, H	2 day	5	-22-47
			~	5-22-27	PE					
	utten MSal			5-22-96	QA					
QA				·	Safety					
Safety					Design	•			_	
Environ.					Enviro	m.				
Other					Other		•			
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	ENGINEERING (CHANGE NOTICE			1. ECH	61444
	-		me cill	<u>10</u>	SON W	-291H-0/1 519 9/21/
2. ECN Category	3. Originatoris Nam	e, Organization, MSIN, a	FILL N.		4. Date	
(mark one)	•	F KH, ER & SW, G3	•		9-19-94	
Supplemental D(] Direct Revision []	5. Project Title/No.		6. Bldg./Sys.		7. Approval	Designator
Change ECN []	W-291H 200 /	AREA BAT/AKART	ETF TRUC	1		/A
Temporary [] Standby []		ENTATION	IN FAC	LITY	· · ·	
Supersedure [] Cancel/Void []	8. Document Humbers (includes sheet r	Changed by this Ech	9. Related EC	N No(s).	-10. Related	PO No.
	H-2-817969	SHT 1,2,3,4,5	W291H-	¢≁10	N	/A/SC/3
	H-2-817	975 SHT 1				,.,,.
	and the second second second second second second second second second second second second second second second	Spec. W-291H-C2)		ya 9/27/94		
11a. Nodification Work	11b. Work Package No.	11c. Nodification Work	Complete '	11d. Resto tion (Temp	red to Origin , or Standby	ECH only)
[] Yes (fill out Bik.		N/A			N/A	
11b) [] No (NA Biks. 11b, unknown 11c, 11d)	UNKNOWN	Cog. Engineer Signa	ture & Date	Cog. En	ineer Signat	ure & Date
12. Description of Change		· · ·				SC/3
ITEM 1: DWG H-2-81		المسادة المساط المسم				
a. ZONE C-4; Chang	e arrynment or i	The and add time	43 2000000000000000000000000000000000000	I SKELLH	UII page 3	•
a. Zone DE-3,4; Ch pa b. Zone AB-7; Chan c. Zone D-7; Chang	ange alignment o ge 6. ge and add line e notes as shown	of line L-1 and ad to profile as sho in sketch on pag	d 4" line wn in sket e 8.	as shown ch on pag	in sketch je 7.	on
a. Zone DE-3,4; Ch pa b. Zone AB-7; Chang c. Zone D-7; Chang d. Zone B-6; Chang e. Zone B-1: Chang	ange alignment o ge 6. ge and add line e notes as shown e detail as shown e note 3 to read	of line L-1 and ad to profile as sho i in sketch on pag m in sketch on pa	d 4" line wn in sket e 8. ge 8. Rela	as shown ch on pag ted ECN:	in sketch Je 7. W291H-271	on 9011/21/94 0
a. Zone DE-3,4; Chi par b. Zone AB-7; Chang c. Zone D-7; Chang d. Zone B-6; Chang e. Zone B-1; Chang 3. The 4" PVC the spec. SEE CONTINUATION SI	ange alignment o ge 6. ge and add line e notes as showm e detail as show e note 3 to read pipe for line L- HEET PAGE 3.	of line L-1 and ad to profile as sho in sketch on pag m in sketch on pa las follows: 1 shall be IAW pi	d 4" line a wn in sketa e 8. ge 8. Rela pe code A d	as shown ch on pag ted ECN: pr B of s	in sketch le 7. W291H-941 ection 02	on 650 of
b. Zone AB-7; Chang c. Zone D-7; Chang d. Zone B-6; Chang e. Zone B-1; Chang 3. The 4" PVC the spec. SEE CONTINUATION SI	ange alignment o ge 6. ge and add line e notes as shown e detail as show e note 3 to read pipe for line L-	of line L-1 and ad to profile as sho in sketch on pag in in sketch on pa las follows:	d 4" line a wn in sketa e 8. ge 8. Rela pe code A d	as shown ch on pag ted ECN:	in sketch le 7. W291H-941 ection 02	on 9011/21/94 0
a. Zone DE-3,4; Chi pay b. Zone AB-7; Chang c. Zone D-7; Chang d. Zone B-6; Chang e. Zone B-1; Chang 3. The 4" PVC the spec. <u>SEE CONTINUATION SI</u> 13a. Justification Cri (mark one)	ange alignment o ge 6. ge and add line e notes as shown e detail as show e note 3 to read pipe for line L- HEET PAGE 3.	of line L-1 and ad to profile as sho in sketch on pag m in sketch on pa l as follows: -1 shall be IAW pi Design Improvement	d 4" line a wn in sketa ge 8. Rela pe code A a [X]	as shown ch on pag ted ECN: or B of s Environmen	in sketch le 7. W291H-941 ection 02	on 650 of
a. Zone DE-3,4; Chi pay b. Zone AB-7; Chang c. Zone D-7; Chang d. Zone B-6; Chang e. Zone B-1; Chang 3. The 4" PVC j the spec. SEE CONTINUATION SI 13s. Justification Cri (mark one)	ange alignment o ge 6. ge and add line e notes as showm e detail as show e note 3 to read pipe for line L- HEET PAGE 3. teris Change [] Hilitate Const. [X]	of line L-1 and ad to profile as sho in sketch on pag m in sketch on pa l as follows: -1 shall be IAW pi Design Improvement	d 4" line a wn in sketa ge 8. Rela pe code A ([X]	as shown ch on pag ted ECN: or B of s Environmen	in sketch le 7. W291H-241 section 02	on 91,51,94 0 650 of
a. Zone DE-3,4; Chi parts b. Zone AB-7; Chang c. Zone D-7; Chang d. Zone B-6; Chang e. Zone B-1; Chang 3. The 4" PVC the spec. <u>SEE CONTINUATION SI</u> 13e. Justification Cri (mark one) As-Found [X] Fac	ange alignment o ge 6. ge and add line e notes as showm e detail as show e note 3 to read pipe for line L- HEET PAGE 3. teris Change [] Hilitate Const. [X]	of line L-1 and ad to profile as sho in sketch on pag m in sketch on pa l as follows: -1 shall be IAW pi Design Improvement	d 4" line a wn in sketa ge 8. Rela pe code A ([X]	as shown ch on pag ted ECN: or B of s Environmen	in sketch le 7. W291H-241 section 02	on 91/21/94 0 650 of
a. Zone DE-3,4; Chipa pay b. Zone AB-7; Chang c. Zone D-7; Chang d. Zone B-6; Chang e. Zone B-1; Chang 3. The 4" PVC the spec. <u>SEE CONTINUATION SI</u> 13a. Justification Cri (mark one) As-Found [X] Fac 13b. Justification Detail: See Continuation SI	ange alignment o ge 6. ge and add line e notes as shown e detail as show e note 3 to read pipe for line L- HEET PAGE 3. teris Change [] Hilitate Const. [X] sheet Page 4.	of line L-1 and ad to profile as sho in sketch on pag las follows: 1 shall be IAW pi Design Improvement Const. Error/Omias	d 4" line a wn in sketa ge 8. Rela pe code A ([X]	as shown ch on pag ted ECN: or B of s Environmen	in sketch le 7. W291H-241 section 02	on () () () () () () () () () ()
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REM/SIA 9/27/94

ENGINEERING CHANGE NOTICE CONTINUATION SHEET

Page 3 of /0

ECN W-291H-2-15 Date 9/19/94

2. DESCRIPTION OF CHANGE CONT.

ITEM 3: DWG H-2-817969 SHT 3 a. Zone B-6,7; Remove gate and change notes as shown in sketch on page 9.

ITEM 4: DWG H-2-817969 SHT 4 a. Zone DEF-1,2,3,4; Remove TYP FENCE DETAIL and associated NOTES.

ITEM 5: DWG H-2-817969 SHT 5 a. Zone C-6; Add conduit to detail as shown in sketch on page 10.

ITEM 6: DWG H-2-817975 SHT 1 a. Zone C-1; Change note 6 to read as follows:

> Pumps shall be supplied by ICF KH and installed by the Contractor IAW manufacturer's recommendations.

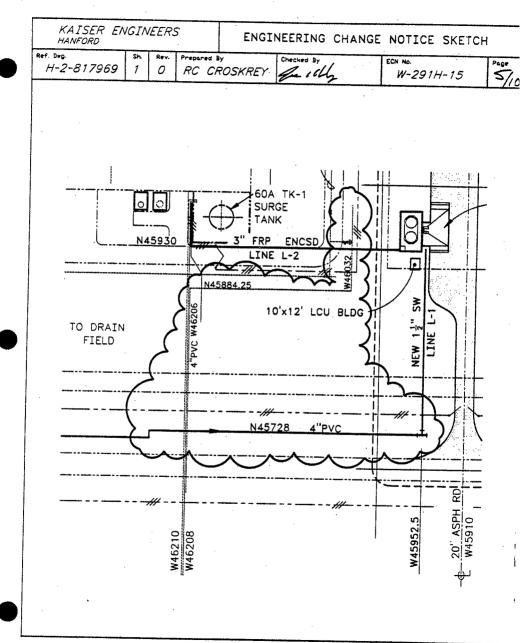
ITEM 7: CONSTRUCTION SPECIFICATION W-291H-C2, SECTION 02831 a. Delete Section 02831, Chain Link Fences and Gates.

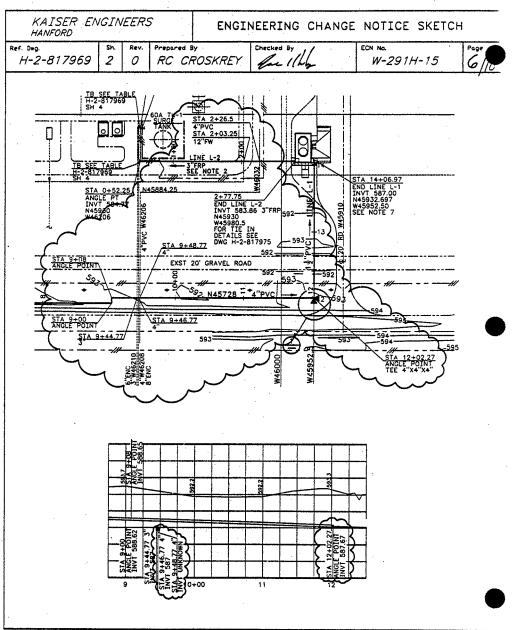
ITEM 8: CONSTRUCTION SPECIFICATION W-291H-C2, SECTION 02831

- a. Pipe Code A: Delete, FLEXIBLE COUPLINGS: COMPRESSION TYPE SLIP ON STEEL; DRESSER TYPE 38 OR 138.
- D. Pipe Code C: Add, FLEXIBLE COUPLINGS: COMPRESSION TYPE SLIP ON STEEL; DRESSER TYPE 38 OR 138.

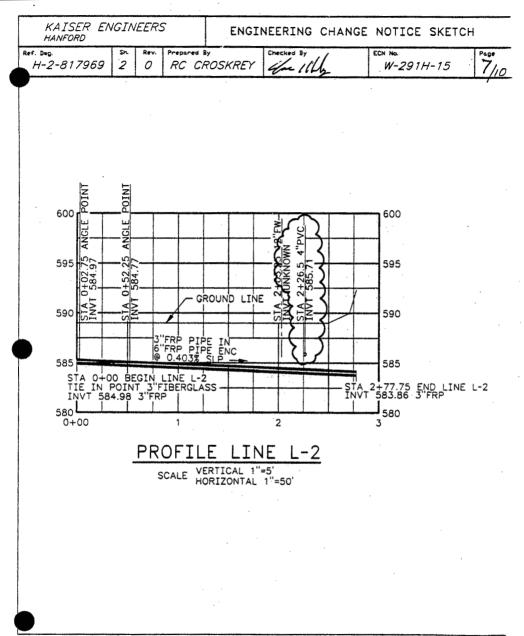


APMISIG_ 9127/94 W-291H-2-15 ECN ENGINEERING CHANGE NOTICE Page 4 of /O 9/19/94 CONTINUATION SHEET Date 13b. JUSTIFICATION DETAILS ITEM 1: a. AF, Sanitary Water line must be moved to avoid leak detection risers installed by project C-018. 4" lined installed by project C-018 is added. ITEM 2: a. AF, Same as Item 1a. b. AF, 4" line installed by C-O18 crosses line L-2 and is added to profile. c. DI, Redundancy in note is removed. d. FC. Pipe material as called out on the drawing made fabrication of pipe expensive and time consuming. ITEM 3: a. AF, Fence is no longer necessary, therefore installation of a gate is not needed. ITEM 4: a. AF, Fence is no longer necessary, therefore the installation of a gate is not needed. ITEM 5. a. DE/O. Conduit penetration was left off of detail. ITEM 6: a. DI. Pump installation note is made more clear. ITEM 7: a. AF. Same as Item 3a and 4a. ITEM 8: a. FC: Because of Item 2d. Compression Coupling is no longer needed in Pipe Code A and is needed in Pipe Code C.

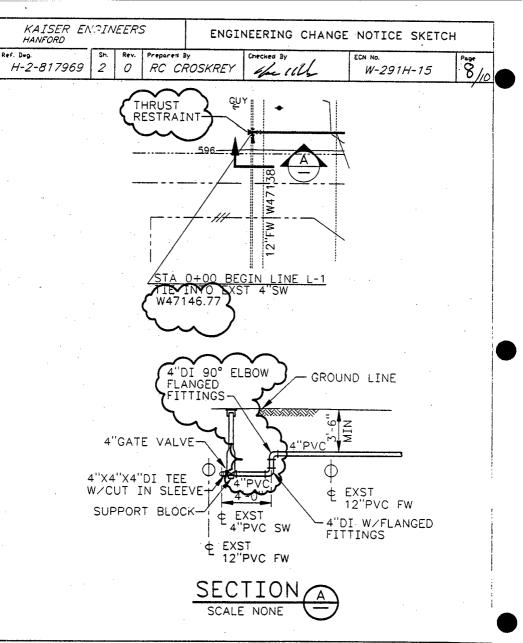


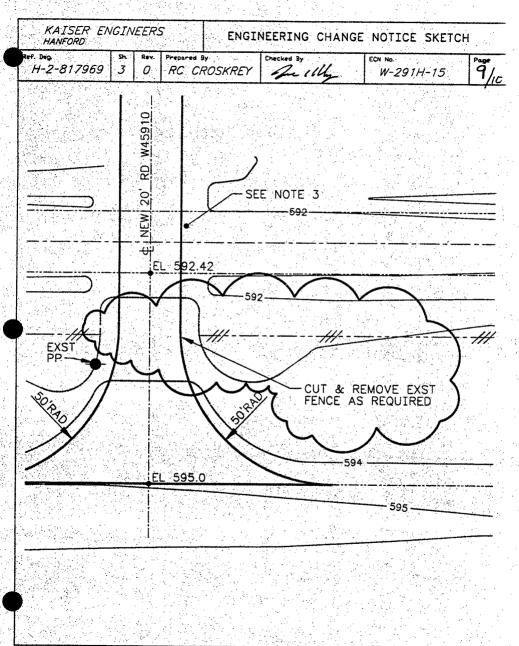


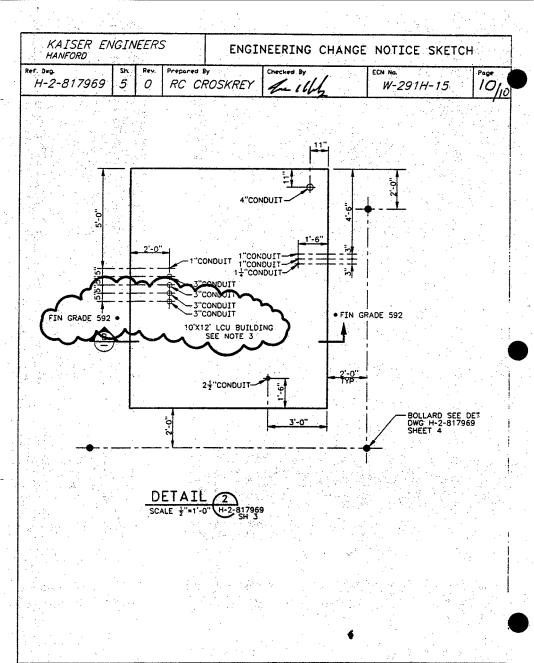
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KEH-0159.00 (1/88) AC-







DOE/RL-97-03, Rev. 0 07/97

APPENDIX 4C

PROFESSIONAL ENGINEER TANK INTEGRITY ASSESSMENT FOR THE 200 AREA EFFLUENT TREATMENT FACILITY TANK SYSTEM

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DBM CONSULTANTS, INC. DONALD B. MAUSSHARDT, P.E.

Registered California Maryland Oregon Virginia Washington 7705 Falstaff Rd. McLean, VA 22102 703-893-2921 703-893-9132 (F)

October 16, 1995

Mr. R. T. Cook, P. E. President & Chief Operating Officer ADTECHS Corporation Suite 520 2411 Dulles Corner Park Herndon, VA 22071

REF: Final RCRA Information Needs Report

Dear Mr. Cook,

I am attaching the final copy of the RCRA Information Needs Report covering section 01010, paragraph 1.7.10.2 of ADTECHS's contract for the ETF Project No. V-C018HCl-001, REV OE. This report, updates the initial March 1993 Information Needs Report prepared for the 100% Design submittal.

It is noted that many of the design documents (plans and specifications) have been revised incorporating changes(ECN's) and have been turned over to ICF-KH. A check of various design document revisions was conducted to assure that conformance with RCRA design requirements. As part of the close-out of the RCRA Independent Needs Report, the plant operation systems tests were observed during the acceptance testing program (ATP) along with the records, to verify conformance with engineering design and specifications for liquid tightness and leak detection.

For those items noted open in my April 1995 report to Mr. Copp Project Manager, all items have now been addressed and the following steps were taken to confirm closure and compliance. A representative sample of the record and modifications were reviewed to verify completeness. A final walkdown of the plant was completed to observe the final SPC used for secondary containment and interviews were conducted with selected staff and contractors to clarify questions raised in the review.

From a RCRA Information Needs stand points, there is one recommendation that would warrant consideration by the operators of the facility. I would recommend that the operators conduct on a annual basis a visual(corrosion indication) and UT(for thickness) inspection of each tank that had been modified or repaired. At the completion of a campaign or at some interval less than a yearly basis, one of the Clawson Tanks be randomly selected for inspection to assure the absence of corrosion. This should include visual and UT(Ultra sound) if any corrosion is observed. The Tanks that should be monitored are: the two Concentrate Tanks(60J-TK-1A & 1B); Secondary Waste Receiving Tanks(60I-TK-1A & 1B); First Stage RO Feed Tank(65A-TK-1).

Mr. R. T. Cook, P. E. October 18, 1995 Page 2

Based upon the information supplied by ADTECHS to me, the facility design complies with the requirements noted in WAC 173-303 et-al. As a registered Professional Engineer licensed in the State of Washington, I have attached my certification to this final report.

Sincerely yours,

Donald B. Mausshardt Independent RCRA Reviewer

CC: Mr. Denny Shiflett

Attachment: Final RCRA Information Needs Report

Section 8

CERTIFICATION SECTION WAC 173-303-810-13A FOR FINAL RCRA INFORMATION NEEDS REPORT FOR EFFLUENT TREATMENT FACILITY CONTRACT V-C018HCL-001, REVISION OE

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified Personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who design the systems, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signed Donald B. Mausshardt, P. E. 10-20.95 Date EXPIRES:

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DOE/RL-97-03, Rev. 0 07/97

APPENDIX 4D

STRUCTURAL INTEGRITY CERTIFICATION OF THE DIKES AT THE LIQUID EFFLUENT RETENTION FACILITY

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DOE/RL-97-03, Rev. 0 07/97

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Enclosure



KAISER ENGINEERS HANFORD COMPANY POST OFFICE BOX 888 RICHLAND, WASHINGTON 99352

REG NO KAISEEH134BM

CERTIFICATION OF QUALIFIED ENGINEER

In accordance with WAC 173-303-650(4)(c)(i) and (ii), I, Edgar A. Goakey, P.E. certify that the dike portion of the W-105 Project has structural integrity. Specifically:

(i) The dike will withstand the stress of the pressure exerted by the types and amounts of wastes to be placed in the impoundment; and

(ii) The dike will not fail due to scouring or piping, without dependence on any liner' system included in the surface impoundment.

This certification is based upon the independent analysis of the structural integrity of the dike as set forth in the KEH memorandum dated March 29, 1991, attached as exhibit 1 and letters from Chen Northern, Inc. dated April 18, 1991 and April 10, 1991 attached as exhibit 2.

DATED THIS _____ day of May, 1991

Kaiser Engineers Hanford, Co.

dyan II. Look Edgar A. Goakey,

Professional Engineer



U. S. Dept of Energy R. J. Auffan Westinghouse Manford Co.

CERTIFICATION ACCEPTED BY

T. M. Hennig

T. L. Norð State of Washington Department of Ecology

 1 The soil/bentonite liner is considered a tertiary liner installed as a part of the dike structure and is in addition to the two flexible membranes (HDPE) and leachate collection system as specified in WAC 173-303 et seq.

-	•	Enclosure
	KAISER ENGINEERS HANFORD	-
	INTEROFFICE MEMORA	NDUM ·
10	S. L. Peterson	DATE March 29, 1991
		FROM E. A. Goakey
COPIES TO		•
		Л/И . он воц
ಸ್ಟಾನಿಗ	RESPONSE TO LETTER OF INSTRUCTION #55,	ISSUE 11 AND 16

Please accept this letter as certification that the dike portion of the basins has been designed for structural integrity to prevent failure without dependence on any liner system included in the surface impoundment construction. The dike will withstand the stress of the pressure exerted by the types and amounts of wastes in the impoundment. The dike has a safety factor greater than 3 against failure by sliding and the top of sides are stabilized with a 3 inch layer of crushed gravel to prevent water and wind erosion of the surfaces.

Calculations are attached.

EAG:sme Attachments



April 18, 1991

Kaiser Engineers Hanford Company P.O. Box 888 Richland, Washington 99352

ATTENTION: Mr. Steve Peterson

SURJECT: Additional Information for Project W-105 Part B Permit Application Compliance with Washington Annotated Codes, (WAC) 173-303-650

Gontlemen:

In accordance with your request of April 17, 1991, we have reviewed previously transmitted information and have prepared additional information regarding compliance of the W-105 geotechnical design with WAC 173-303-650. The new information includes:

o Scour and piping potential for the soil-bentonite liner.

Page 1 or J

We have reviewed the following information previously transmitted p Kaiser Engineers Hanford Company (KEH):

- Soil-Bentonite Liner Permeability (Chen-Northern letter of March 11, 1991 to KEH).
- o Shear strength, dike stability, settlement, subsidence, and uplift stresses on the gravel dikes and soil-bentonite liner (Chen-Horthern letter of March 25, 1991 to KEH). In these analyses, each basin liner was assumed to consist of two High Density Polyethylene liners and a tertiary soilbentonite system. The soil-bentonite liner was considered to be part of the dikes in regard to structural integrity.
- o Piping and scour potential of the gravel dikes (Chen-Northern letter of April 10, 1991 to KEH).

The results of our review and recent analysis indicates that:

- The W-105 dikes, including the gravel basins and soilbentonite liner, are expected to withstand the hydraulic pressures exerted by the liquid waste in the impoundment.
- The geotechnical design of the W-105 project, including the factors listed above, complies with the requirements set forth in WAC 173-303-650.

April 18, 1991

Kaiser Engineers Hanford Company F.O. Box 888 Richland, Washington 99352

ATTENTION: Mr. Steve Peterson

SUBJECT: Additional Information for Project W-105 Part B Permit Application Compliance with Washington Annotated Codes, (WAC) 173-303-650

Gantlemen:

In accordance with your request of April 17, 1991, we have reviewed previously transmitted information and have prepared additional information regarding compliance of the W-105 geotechnical design with WAC 173-303-650. The new information includes:

o Scour and piping potential for the soil-bentonite liner.

Page 1 or 3

We have reviewed the following information previously transmitted to Kaiser Engineers Hanford Company (KEH):

- o Soil-Bentonite Liner Permeability (Chen-Northern letter of March 11, 1991 to KEH).
- o Shear strength, dike stability, settlement, subsidence, and uplift stresses on the gravel dikes and soll-bentonite liner (Chen-Northern letter of March 26, 1991 to KEH). In these analyses, each basin liner was assumed to consist of two High Density Polyethylene liners and a tertiary soilbentonite system. The soil-bentonite liner was considered to be part of the dikes in regard to structural integrity.
- Piping and scour potential of the gravel dikes (Chen-Northern letter of April 10, 1991 to KEH).

The results of our review and recent analysis indicates that:

- The W-105 dikes, including the gravel basins and soilbentonite liner, are expected to withstand the hydraulic pressures exerted by the liquid waste in the impoundment.
- The geotechnical design of the W-105 project, including the factors listed above, complies with the requirements set forth in WAC 173-303-650.

Attachment 2 Page 2 of 3

Kaiser Engineers Hanford Company April 18, 1991 Page 2 of 2

If you have any questions regarding this letter, or if we can be of further service, please contact us.

Respectfully Submitted, CHEN-NORTHERN, INC. Bri ams, P.G. gincer 2 ptz. rie. Manade

Chen@Northern.Inc.

Attachment 2 Page 3 of 3

Construction and a second

. PIPING AND SCOUR

Chens Northern Inc.

Piping through a soil-bentonite liner may occur when the liner is penetrated by some conduit (hole or leakage path), and water is allowed to pass unimpeded through the conduit. In the design of the w-J05 soil-bentonite liner, a non-woven geotextile (Polyfelt TS 750 *) was specified for placement between the gravel dike materials and the soil-bentonite liner. Our analysis indicates that the geotextile will perform as an effective retention barrier, thus minimizing the potential for soil-bentonite liner piping.

Scour of a soil-bentonite liner is a function of flow type and velocity of flow adjacent to the soil-bentonite liner. Under normal operating conditions of hydrostatic pressure, a pinhole-type or senm-type leak is the normal mode of leakage. This type of leakage is typically low velocity and low volume. In this case, scour is not expected to occur. Scour of the soil-bentonite liner is only expected to occur under conditions of high velocity turbulent flow, such as a hose directed at unprotected section of the soilbentonite, or a large-scale pipe failure leaking high-pressure fluid directly onto the soil liner. Since no piping pentrates the soil-bentonite liner, this situation is not expected to occur. Chen@Northern.Inc.

Attachment 3 Page 1 of 3

April 10, 1991

Kaiser Engineers Hanford Company P.O. Box 888 Richland, Washington 99352

ATTENTION: Mr. Steve Peterson

SUBJECT: Additional Information H-105 Part B Permit Application

Gentlemen:

In accordance with your request of April 9, 1991, we have reviewed the potential for scour and piping in the gravel dikes of the W-105 project.

Our analysis indicates that, under all liner leakage conditions (excluding total loss of the liner), piping or scour are not expected to impact the stability of the gravel dikes.

you have any questions regarding this letter, or if we can be of further service, please call us.

Respectfully Submitted, CHEN-NORTHERN, INC.

, (7. Williams MAR.K. Brian J. Hilliams, P.G. eotochnical Engineer J, Burrie; P.E. bivision Manager

Attachment 3 Page 2 of 3

PIPING AND SCOUR

AND A STREET

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Piping is a progressive erosion and transport mechanism which may occur when seepage forces through a water-retaining embankment cause erosion at the downstream face of the embankment. The erosion progresses upgradient from the face of the embankment and eventually encounters the impounded fluid, precipitating a massive loss of fluid. The primary factors controlling piping are embankment grain size and the exit velocity of seepage water through the embankment.

Scour is an open-surface erosion mechanism which may occur when free-field water velocities are of sufficient velocity to erode and transport particles, in accordance with Stokes law. The primary factors controlling scour are water velocity and grain size.

The basic assumption behind potential piping or scour is that a phreatic surface has formed through or below the water-retaining embankment, and that the seepage forces along, inside, or downstream (outside) of the embankment are sufficient to erode the embankment soils.

At the W-105 project, under all conditions except complete loss of the liner, no phreatic surface is expected to develop through the embankment which exits outside (downstream) of the embankment. The reasons for this include:

- o Groundwater at the project site is more than 150 feet below the ground surface.
- o The in-place permeability of the native soils is relatively high, ranging from about 5.5x10-4 centimeters per second to 1 centimeter per second (Chen-Northern, 1990).

Considering the relatively deep groundwater and relatively high rate of subsurface permeability, pond leakage (through the liner system) will tend to migrate vertically downward. In the case of this vertical flow, the basic mechanisms precipitating scour and piping cannot occur, and therefore neither piping or scour is expected to impact the stability of the gravel dikes at the W-105 project.

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RREFERENCES

Then-Northerrn, Inc., 1990, "<u>Report of Geotechneial Investigation</u> <u>W-105 242-A Evagoration and Eurex Interim Rontention Basins</u>", Report for Kaiser Engineers Hanford Company.





Department of Energy

Richland Operations Office P.O. Box 550 Richland, Washington 99352

MAY 1 7 1991

91-WOB-172

Mr. Timothy L. Nord Hanford Project Manager State of Washington Department of Ecology Mail Stop PV-11 Olympia, Washington 98504

Dear Mr. Nord:

RESPONSE TO MAY 3, 1991, LETTER, "LERF POND LINER, LETTER OF APRIL 30, 1991, CERTIFICATION"

Reference: Letter, S. H. Wisness, U. S. Department of Energy-Richland Operations Office to T. L. Nord, Washington Department of Ecology, Response to April 30, 1991, letter, "LERF Pond Liner, Test Pad No. 6, "dated May 3, 1991.

The subject letter again raises the question of "certification." At the technical meeting held in Richland, Washington, attended by your representatives, they accepted the "certification" as answered in the reference letter (repeated below):

"The April 10 and 18 letters from Chen-Northern Inc., were discussed in relation to certifying that the dikes will not fail due to scouring or piping. It was agreed by Ecology (Gary Anderson) that both of these Professional Engineer (PE) stamped letters are acceptable and complete documentation that "the dikes will not fail due to scouring or piping" as required by WAC 173-303-650. It was also agreed that the Professional Engineer's opinion as indicated by the stamping of the aforementioned letters is acceptable and is consistent with the EPA permitting requirements for land disposal facilities cited in the Federal Register July 26, 1982, and as stated in RCW 18.43.070, Certificates and Seals; 1989 (both quoted below):

o Federal Register July 26, 1982 - 'The terms "certification," "certify," and "certified" are used throughout the regulations,' including those promulgated today, to refer to the rendering of a professional opinion concerning compliance with a requirement of the regulations by a qualified professional in the field. Commenters have suggested that courts sometimes interpret these terms to imply that certification is equivalent to a guarantee or warranty, thus relieving other parties (e.g., owners and operators) of their responsibilities under regulations as a result of such certification. This was not intended by the Agency in the various RCRA certification requirements. By requiring a certification, the Agency is seeking the opinion from a 0

professional qualified in the field but does not intend to relieve owners and operators from their responsibilities under the regulations. The definition does not address the potential liabilities of the certifying party. This a matter to be resolved between the certifying party and the owner or operator in accordance with applicable law. Since EPA still believes the terms "certification" and "certify" accurately denote the Agency's intention, EPA is choosing to define the terms to eliminate possible legal misinterpretation.'

RCW 18.43.070, Certificates and Seals, 1989 - 'Each registrant hereunder shall upon registration obtain a seal of the design authorized by the board, bearing the registrant's name and the legend "registered professional engineer" or "registered professional land surveyor". Plans, specifications plats and reports prepared by the registrant shall be signed, dated and stamped with said seal or facsimile thereof. Such signature and stamping <u>shall constitute a certification</u> (underline emphasis added) by the registrant that the same was prepared by or under his direct supervision and that to his knowledge and belief the same was prepared in accordance the requirements of statute.'

The recorder's note from the May 1, 1991 technical meeting, indicates that Mr. Anderson stated, "in the morning (5-2-91) I'll grab Toby Michelena and tell him the results of this meeting and tell him that my objections to the moisture content spread are satisfied and I can accept the <u>certification</u> <u>because it is indeed a valid certification</u> (underline added) and I can recommend that we proceed with lining the ponds."

To expeditiously receive construction authorization, the attached "Certification of Qualified Engineer" was prepared and provided to you in Richland, Washington, on May 5, 1991. With attainment of your signature, construction of the LERF basins commenced on May 6, 1991.

It is felt that the "Certification of Qualified Engineer" was not required since the Revised Code of Washington defines the stamp and signature of a registered professional engineer as meaning "certification". I wish to point out that the preparation of the "Certification of Qualified Engineer" was done to minimize continued delay in starting construction of the LERF basins, since any additional delay would have cost greater than \$11,000 per day.

A protocol must be established to identify Ecology's role in Hanford's construction activities. Though we welcome your participation, we must ensure that DOE retains the role of project/program manager. Ecology needs to be provided access and review of activities/documents while maintaining the stance of an independent regulatory. Please let me know when a special meeting to clarify our working protocol can be arranged.

Mr. Timothy L. Nord

Questions on this should be directed to Ms. T. M. Hennig on (509) 376-6888.

-3-

Sincerely, Steven H. Wisnessf Hanford Project Manager

Attachment

cc w/att P. Stasch, Ecology G. Anderson, Ecology T. Michelena, Ecology T. B. Veneziano, WHC D. E. Kelley, WHC



DOE/RL-97-03, Rev. 0 07/97

APPENDIX 7A

BUILDING EMERGENCY PLAN FOR 200 AREA EFFLUENT TREATMENT FACILITY AND LIQUID EFFLUENT RETENTION FACILITY

Because the ETF, LERF, and the 200 Area Treated Effluent Disposal Facility (TEDF) are operated and managed by the same organization, the scope of this unit-specific building emergency plan addresses the 200 Area TEDF in addition to the ETF and LERF. The 200 Area TEDF is a conveyance and disposal system for non-hazardous, non-mixed wastewaters. Sections 1.4.3, 1.5.3, 5.3, and 6.1.3 pertain to the 200 Area TEDF, therefore, are included for completeness but are not subject to the requirements of WAC 173-303. RUST FEDERAL SERVICES OF HANFORD INC.

BUILDING EMERGENCY PLAN FOR 200 AREA EFFLUENT TREATMENT FACILITY AND LIQUID EFFLUENT RETENTION FACILITY

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Organization	RFSH/LWPF

Approved by

DW Lindsey, Manager 200 AREA LIQUID WASTE PROCESSING FACILITIES

This plan covers the following Locations:

200 Area Effluent Treatment Facility (ETF) Liquid Effluent Retention Facility (LERF) 200 Area Treated Effluent Disposal Facility (TEDF) 200 Area Effluent Treatment Facility Groundwater Transfer System (GTS)

Approved:

Building Emergency Director

Hanford Fire Department

This document will be reviewed annually and updated as required by the Building Emergency Director and modified pursuant to Washington Administrative Code (WAC) 173-303-830 and in accordance with the Hanford Facility RCRA permit. This document will be approved by the primary Building Emergency Director, Manager of Emergency Preparedness (or delegate), and the Hanford Fire Department.

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1.0 GENERAL INFORMATION

The 200 Area Effluent Treatment Facility (ETF) and the Liquid Effluent Retention Facility (LERF) are located in the northeast portion of the 200 East Area. The 200 Area Treated Effluent Disposal Facility (TEDF) and 200 Area ETF Groundwater Transfer System (GTS) are operated from the 2025E building. Transfer piping systems for both TEDF and GTS are located in the 200 East and 200 West areas. 200 East and 200 West areas are located near the center of the Hanford Site, a 560 square mile U.S. Department of Energy (DDE) site in southeastern Washington State.

1.1 FACILITY NAMES:

U.S. Department of Energy Hanford Site 200 Area Effluent Treatment Facility (ETF) Liquid Effluent Retention Facility (LERF) 200 Area Treated Effluent Disposal Facility (TEDF) 200 Area ETF Groundwater Transfer System

1.2 FACILITY LOCATIONS: Benton County, Washington; within the 200 East and 200 West Areas.

ETF Buildings/facilities are:

2025E Building 2025EA Building MO-269 Load-in Station Effluent Treatment Facility ETF Administration Building Materials Control Trailer Tanker truck load-in station

LERF Buildings/facilities are:

Basins 42, 43, and 44	Liquid Effluent Retention Facil
Change Trailer	Located directly between Basins

242AL71 Instrument Building

Electrical Power Substation

Liquid Effluent Retention Facility Located directly between Basins 42 and 43 Located north between Basins 42 and 43 North side of LERF

TEDF and GTS Buildings/facilities are:

Transfer piping 225W Building 225E Building 6653A Building 6653 Building 200 East and West areas Pump House 1 - 200 West Area Pump House 2 - 200 East Area Pump House 3 - 200 East Area Disposal Sampling Building

1.3 OWNER:

U.S. Department of Energy Richland Operations Office 825 Jadwin Avenue Richland, Washington 99352 RUST FEDERAL SERVICES OF HANFORD, INC.

BUILDING EMERGENCY PLAN FOR 200 AREA EFFLUENT TREATMENT FACILITY AND LIQUID EFFLUENT RETENTION FACILITY Document:HNF-IP-0263-ETFRevision:3Page:2 of 40Effective Date:6/27/97

FACILITY MANAGER: Rust Federal Services of Hanford, Inc. P.O. Box 700 Richland, Washington 99352

ORGANIZATION: Liquid Waste Processing Facilities (LWPF)

1.4 DESCRIPTION OF THE FACILITY AND OPERATIONS

1.4.1 Effluent Treatment Facility

The ETF treats various aqueous wastes generated at the Hanford site prior to discharging the effluent to a State Approved Land Disposal Site (SALDS), located adjacent to the 200 West Area.

The ETF operations structure is comprised of the following:

Process area in 2025E Building Administration areas in 2025E and 2025EA Buildings Load-in Station External tank storage area

The 2025E Building is a two story structure, with a control room on the second level overlooking the process area. The process area is a high bay, single story area of the 2025E Building. The process area is a Radiological Buffer Area (RBA). The RBA is a posted area and contains various Radiological Controlled Areas (RCA). The entire 200 East Area is classified as an RCA.

The external tank storage area is inside the fenced area immediately outside of the 2025E Building. The 200 East Area security fence encloses the ETF except for the discharge line from the verification tanks to the SALDS. This fence is used to control personnel access and exclude deer and other large animals from the facility.

Figure 1 shows the evacuation routes from the 2025E Building.

Figure 2 shows the ETF/LERF site staging areas.

1.4.2 Liquid Effluent Retention Facility

The LERF consists of three identical surface impoundments constructed with primary and secondary composite liners, a leachate detection, collection, and removal system between liners, and a floating cover. The LERF basins act as an interim storage location for aqueous waste from the 242-A Evaporator, groundwater, and other site remediation projects prior to treatment at ETF. The LERF is a basin operations structure comprised of the following:

Excavation and dikes (basins)

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- Primary and secondary composite liners
- Leachate detection, collection, and removal system
- Cover
- Piping and pumps
- MO-727 Change trailer
- 242A171 Instrument Building

1.4.3 200 Area Treated Effluent Disposal Facility and Groundwater Transfer System

The 200 Area TEDF transports the 200 East and West Area facility effluents to a common disposal system. TEDF consists of approximately 62,000 feet of collection and transfer system piping, three pump stations, a sample building, and two 5-acre disposal ponds located southeast of ETF. The TEDF accepts liquid effluents from numerous sources in the 200 East and 200 West Areas that meet environmental permit requirements for disposal in the disposal ponds.

The GTS transfers groundwater extracted from the 200-UP-1 Operable Unit for interim storage at LERF and subsequent treatment at ETF. The system boundary begins at the first flowmeter from the 200-UP-1 pumps in the 200 West Area and ends at the connection to the LERF basins sample riser.

Figure 3 shows the major facility structures and liquid effluent sources for the SALDS, TEDF, and GTS.

1.5 BUILDING EVACUATION ROUTING

Figures 1 and 2 show building evacuation routes and staging areas.

1.5.1 Effluent Treatment Facility

The 2025E Building evacuation routes are shown in Figure 1. Primary and Alternate staging areas are shown in Figure 2.

1.5.2 Liquid Effluent Retention Facility

Primary and alternate staging areas are shown in Figure 2.

1.5.3 Treated Effluent Disposal Facility

Figure 3 shows the TEDF location.

1.5.4 Groundwater Transfer System

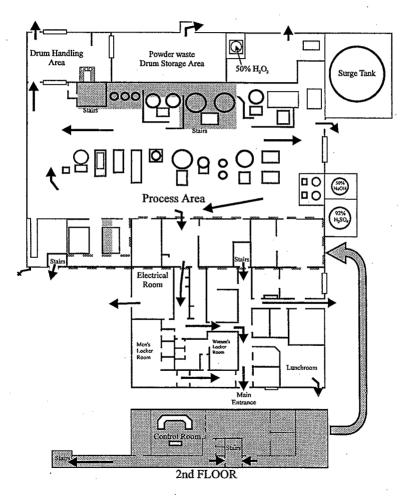
Figure 3 shows the GTS location.

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BUILDING EMERGENCY PLAN FOR 200 AREA EFFLUENT TREATMENT FACILITY AND LIQUID EFFLUENT RETENTION FACILITY

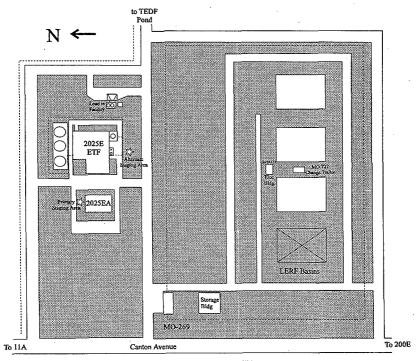
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FIGURE 1 - EVACUATION ROUTES FROM 2025E



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FIGURE 2 - ETF/LERF SITE PLAN

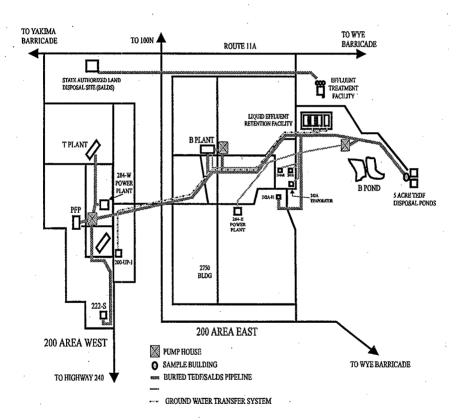


[🕁] Staging Area

ETF or LERF site evacuation routes will be determined by the Building Emergency Director dependent on event location and wind direction

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FIGURE 3 - 200 AREA LWPF - SALDS, TEDF, GROUND WATER TRANSFER SYSTEM



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2.0 PURPOSE

This plan describes both the facility hazards and the basic responses to upset and/or emergency conditions. "Emergency" as used in this document includes events meeting the Washington Administrative Code (WAC) 173-303 definition of emergency as well as U.S. Department of Energy (DDE) Order DDE 0 232.1 categories of Unusual Occurrence and Emergency. These events include spills or releases, fires and explosions, transportation activities, movement of materials, packaging, storage of hazardous materials, and natural and security contingencies. When used in conjunction with the *Hanford Facility Contingency Plan* (DDE/RL-93-75), this plan meets the requirements for contingency planning as required by WAC 173-303.

3.0 BUILDING EMERGENCY ORGANIZATION

3.1 BUILDING EMERGENCY DIRECTOR

The Building Emergency Director (BED) or designated alternate has overall responsibility for implementing this plan. The BED has the responsibilities of the Emergency Coordinator as discussed in WAC 173-303-360 and is also the Event Commander for facility related events. A listing of primary and alternate BEDs by title, work location, and work telephone number is contained in Section 13 of this plan. Emergency Preparedness maintains a listing of BED names, work, and home telephone numbers, at the Patrol Operations Center (POC), in accordance with Hanford Facility RCRA Permit, Dangerous Waste Portion, General Condition II.A.4. The BEDs have the authority to commit all necessary resources (both equipment and personnel) to respond to any emergency. Additional responsibilities have been delegated to Hanford Fire Department (HFD) personnel who, as the designated Incident Commander, are authorized to act for the BED when the BED is absent in accordance with the *Hanford Facility Contingency Plan* (DDE/RL-93-75), Section 3.0. These HFD personnel have the authority to commit all necessary resources (both equipment and personnel) to respond to any emergency.

3.2 OTHER MEMBERS

As a minimum, the BED or designee appoints and trains individuals to perform as Personnel Accountability Aides and Staging Area Managers. The accountability aides are responsible for facilitating the implementation of protective actions (evacuation or take cover) and for facilitating the accountability of personnel after the protective actions have been implemented. Staging Area Managers are responsible for coordinating/conducting activities at the staging area. In addition, the BED may identify additional support personnel (rapid and detailed evaluation inspector, radiological control, maintenance, engineering, hazardous material coordinators, etc.) to be part of the building emergency organization.

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The complete building emergency organization listing of positions, names, work locations, and telephone numbers for these facilities is maintained in a separate location in a format determined appropriate by facility management. Copies are distributed to appropriate facility locations and to Emergency Preparedness.

4.0 IMPLEMENTATION OF THE PLAN

To meet the requirements of WAC 173-303-360, this plan will be considered implemented when the BED has determined that a release, fire, or explosion involving dangerous waste or dangerous waste constituents that could threaten human health or the environment (WAC 173-303 Emergency) has occurred at the facility. An incident requiring evacuation of personnel or the summoning of emergency response units will not necessarily indicate that the plan has been implemented. The incident classification process is described in the *Hanford Facility Contingency Plan* (DDE/RL-93-75), Sections 4.0, 5.1.4, and 5.1.5.

Under DOE guidance, this plan will be considered implemented whenever the BED determines that one of the incidents listed in Section 6.0 has or will occur and that the severity is or will be such that there is a potential to endanger human health or the environment (DOE Unusual Occurrence or Emergency).

LWPF implements this plan through emergency response guides, plant casualty plans, and other documents in Attachment A.

The BED must assess each incident to determine the response necessary to protect personnel, facility, and the environment. If emergency assistance from Hanford Patrol, Fire, or ambulance units is required, the Hanford Emergency Response Number (911) must be used to contact the POC and request the desired assistance. To request other resources or assistance from outside the facility, the POC business number is used (373-3800).

5.0 FACILITY HAZARDS

Facility hazards and potential targets are identified and evaluated in the hazards assessment required by DOE Orders for the LERF/ETF. The hazards assessment is not used in the Hanford Facility contingency planning program. The objective of this section of the emergency plan is to document all known hazards that pose significant risks to human health or to the environment and identify quantitative values for those significant risks.

Certain information in this plan pertains only to DOE Order considerations (e.g., discussions pertaining to hazards from hazardous materials and radioactive-only materials). Terms such as Emergency Response Protective Guidelines (ERPG), Alert Emergencies, Site Area Emergencies, and General Emergencies pertain only to DOE Order planning considerations. These hazards and terms are not part of the

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Hanford Facility contingency planning program. The only portion of this section that is part of the Hanford Facility contingency planning program are the chemical constituent hazards discussed in Section 5.1.3, 5.2.3, and 5.3.3.

Hazardous Material

Appropriate emergency response protective actions are based on the amount of hazardous material released and the potential consequences that material might have on human health and the environment. ERPGs identify consequences related to the following exposure levels for hazardous material:

- ERPG-1 is the maximum airborne concentration below which it is believed that nearly all individuals could be exposed for up to 1 hour without experiencing effects other than mild transient adverse effects or perceiving a clearly defined objectionable odor.
- ERPG-2 is the maximum airborne concentration below which it is believed that nearly all individuals could be exposed for up to 1 hour without experiencing or developing irreversible or other serious health effects or symptoms that could impair their abilities to take protective action.
- ERPG-3 is the maximum airborne concentration below which it is believed that nearly all individuals could be exposed for up to 1 hour without experiencing or developing life-threatening health effects.

The criteria for emergency classification correlates the ERPG to boundaries between the hazardous material and the public and environment.

Radiological Material

The hazards assessment uses the maximum bounding radiological inventories at the ETF, which include waste characteristics, along with the surge tank, secondary waste receiving tank, evaporator concentrate tank, verification tanks, and 1,000 powder drum inventories added together to develop the total inventory for ETF. The total activities of individual isotopes are below 10 CFR 307.2, Schedule C, quantities and do not meet the requirement for analysis. Inventories at LERF are determined by the waste characteristics, along with the retention basin radiological inventories added together to develop the total inventory. Radiation survey results will alert the operator to a problem that might impact the human health or the environment.

Classification Criteria for an Alert Emergency

An Alert Emergency is declared when events are in progress or have occurred that involve an actual or potential substantial degradation of the level of safety of the facility with an increased potential for a release. This includes any

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release of hazardous or radiological materials that can be reasonably expected to exceed the following:

Hazardous Materials - Release:

Exposure (air concentrations) of > ERPG-1 but < ERPG-2 at the facility boundary.

Radioactive Materials - Release:

Projected dose > 100 millirem (0.001 Sv) Total Effective Dose Equivalent (TEDE) as calculated at the affected facility boundary.

Classification Criteria for a Site Area Emergency

A Site Area Emergency is declared when events are in progress or have occurred that involve actual or likely major failures of facility functions needed for the protection of human health and the environment. This includes any release of hazardous or radiological materials that can be reasonably expected to exceed the following:

Hazardous Materials - Release:

Exposure limits (air concentrations) > ERPG-2 at the facility boundary but < ERPG-2 at the Hanford Site boundary.

Radioactive Materials - Release:

Projected dose \geq 1 rem (0.01 Sv) TEDE as calculated at the affected facility boundary.

Classification Criteria for a General Emergency

A General Emergency is declared when events are in progress or have occurred that involve actual or imminent catastrophic failure of facility safety systems with a potential for loss of confinement or containment integrity. This includes any release of hazardous or radiological materials that can be reasonably expected to exceed the following:

Hazardous Materials - Release:

Exposure limits (air concentrations) > ERPG-2 criteria at the Hanford Site boundary.

Radioactive Materials - Release:

Projected dose \geq 1 rem (0.01 Sv) TEDE as calculated at the Hanford Site boundary.

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5.1 ETF HAZARDS

5.1.1 Hazardous Materials

Materials at the ETF defined in DOE Order guidance as potentially hazardous include chemicals added as part of the treatment process, chemicals added to prevent corrosion, and anti-foaming agents added to the evaporator. There are no explosives in the system, although some chemicals can react or decompose violently. Hazardous chemicals in the process liquid are discussed in Section 5.1.3.

Hazardous process chemicals identified in the hazards assessment are given in Table 1, including the associated DOE Order ERPG values. DOE Order emergency planning ensures that appropriate protective actions are taken for the full range of events from a release of hazardous material that has the potential to exceed limits.

ľ		·	ERPG Values		
	Hazardous Chemical	1	2	3	
	50% hydrogen peroxide	NA	25 ppm	50 ppm	
	92% sulfuric acid	2 mg/m ³	10 mg/m ³	30 mg/m ³	
	50% sodium hydroxide	2 mg/m ³	40 mg/m ³	100 mg/m ³	

Table 1 ETF HAZARDOUS PROCESS CHEMICALS

ppm-parts per million mg-milligram m³-cubic meter

5.1.2 Industrial Hazards

The industrial hazards associated with the facility include electrical equipment, rotating equipment, confined spaces, compressed gas cylinders, and propane tanks. The industrial hazards associated with the facility do not pose a threat to the human health or the environment. Industrial hazards are addressed in the building health and safety plan and maintenance programs.

5.1.3 Radioactive/Dangerous/Mixed Waste

5.1.3.1 Solid Form

There are three types of solid mixed wastes at ETF:

 Secondary waste powder - A dry powder with a low radioactivity level that may contain ammonium, sodium, sulfates, silicon, nitrates, calcium, magnesium, and trace metals. The ETF Process Run Plan will document the characterization of the waste streams. The process drum capacity is 55

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gallons. Locations include the thin film dryer room, drum handling area, and the process drum storage area. Maximum radiological source terms and hazardous materials for the secondary waste powder are below the levels requiring evaluation for emergency preparedness concerns.

- Indirect Waste Materials that are used in the treatment process. These
 materials include spent resin beads, spent reverse osmosis membranes, spent
 high efficiency particulate air (HEPA) cartridges, carbon filter medium,
 and spent filter elements. Storage locations could include all staged
 maintenance areas or satellite accumulation areas.
- Dry active waste Small quantities of waste from routine operations and maintenance activities (i.e., rags, sampling media, etc.). Locations include the process area, external tank area, staged maintenance areas, and satellite accumulation areas.

5.1.3.2 Liquid Form

The aqueous waste treated at ETF may contain trace amounts of radioactive materials and/or dangerous chemical constituents. The radioactive/dangerous/ mixed waste is evaluated in the hazards assessment as required by DOE Orders. Maximum radiological source term and dangerous waste materials are evaluated in the ETF Process Run Plan. The amount present must be below the levels requiring reevaluation for emergency preparedness concerns prior to treatment.

The influent aqueous waste to the ETF is treated in the primary treatment train to remove contaminants to allow discharge to the ground in accordance with the Washington state Discharge Permit. These contaminants are concentrated in the secondary treatment train and are addressed in Section 5.1.3.1.

Emergency planning activities include implementing instructions that evaluate conditions and consequences associated with abnormal radiation levels, as well as release of waste water. For the purposes of field measurements, the site boundary is defined as 100 meters from the facility buildings.

5.1.3.3 Gaseous Form

Airborne effluent streams are produced through the following:

- Radiological control area Heating Ventilation Air Conditioning (HVAC) system - exhaust from radiologically controlled areas.
- Vessel offgas system Vapors and gases from the various tanks and treatment systems.

The vessel offgas HEPA filters remove particulate and condensate from the air stream before discharge to the radiologically controlled area HVAC system. The

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combined air stream passes through another $\ensuremath{\mathsf{HEPA}}$ filter and is monitored for radiation.

Analysis shows that potential radioactive release levels are less than the values requiring event classification.

5.1.4 Criticality

A criticality is not a credible hazard at ETF. Emergency planning is not required.

5.2 LERF HAZARDS

5.2.1 Hazardous Materials

No hazardous material is stored at LERF. Small quantities of hazardous material could be used in maintenance and sampling activities. Any release of these materials would not be classed as a WAC 173-303 or DOE emergency. No emergency planning response is required.

5.2.2 Industrial Hazards

The industrial hazards associated with LERF include electrical equipment, rotating equipment, confined spaces, compressed gas cylinders, and propane tanks. The industrial hazards associated with the facility do not pose a threat to the health and safety of the general public or environment. Industrial hazards are addressed in the building health and safety plan and maintenance programs.

5.2.3 Radioactive/Dangerous/Mixed waste

5.2.3.1 Solid Form

Small quantities of low radioactivity mixed waste from routine operations and maintenance activities (i.e., rags, sampling media, etc.). Locations include sampling areas, staged maintenance areas, and satellite accumulation areas. Any release of these materials would not be classed as a WAC 173-303 or DOE emergency. No emergency planning response is required.

5.2.3.2 Liquid Form

The aqueous waste stored in the LERF basins may contain trace amounts of radioactivity with dangerous chemical constituents and is evaluated in the hazards assessment as required by DOE Orders. Maximum radiological source terms for LERF are below the levels requiring evaluation for emergency preparedness concerns. The chemical constituent of concern, based on worst case scenarios for process condensate from the 242-A Evaporator, is ammonia. DOE Order ERPG values are shown in Table 2.

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		ERPG Values	
Constituent	1	2	3
Process liquid - Ammonia	25 ppm	200 ppm	1000 ppm

Table 2 LEDE MASTE CHEMICAL CONSTITUENTS OF CONCEDN

5.2.3.3 Gaseous Form

Airborne effluent streams produced from the wastewater in the basins is vented through the basin vent system. Analysis shows that potential for gaseous release levels are less than the values requiring event classification. However, release modes for the basin liquid are discussed in section 5.2.3.2.

5.2.4 Criticality

A criticality is not a credible hazard at LERF. Emergency planning is not required.

5.3 TEDF AND GROUND WATER TRANSFER SYSTEM HAZARDS

The hazards associated with the TEDF and the GTS are industrial hazards only. Industrial hazards to facility personnel are addressed in the building health and safety plan and maintenance programs.

5.3.1 Hazardous Materials

Only small amounts of sample preservative chemicals are stored at the TEDF. There are no hazardous materials associated with the TEDF or GTS that would pose a threat to human health or the environment. However, maintenance and sampling activities might require the use of small quantities of hazardous materials. Hazards associated with maintenance and sampling activities are addressed in the 'health and safety plan and maintenance programs.

5.3.2 Industrial Hazards

The industrial hazards associated with the TEDF include electrical equipment, rotating equipment, confined spaces, compressed gas cylinders, and propane tanks. A propane storage tank for the pump house #1 Standby Power Generator is the only hazard above common industrial hazards. Response to an event involving the propane tank would be as a result of fire or explosion. The industrial hazards associated with the TEDF or GTS do not pose a threat to human health or the environment.

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5.3.3 Radioactive/Dangerous/Mixed Waste

The level of radioactive/dangerous materials in the influent to TEDF allows for disposal as a nondangerous waste. The total inventory of the GTS is based on the volume of the transfer line and the concentration of contaminants in the 200-UP-1 groundwater. The radioactive/dangerous material inventories associated with the aqueous waste in the TEDF or GTS are sufficiently low that there is no threat to human health or the environment.

5.3.4 Criticality

A criticality accident is not credible at the TEDF or GTS.

6.0 POTENTIAL EMERGENCY CONDITIONS

The objective of this section is to identify the appropriate emergency classification level value limit. Protective actions based on classification are discussed in Section 7.0 of this plan. Technical justification for the values and limits identified in this section are provided in the hazards assessment and hazard categorization documentation required by DOE Orders.

Potential emergency conditions may fall into one of three basic categories: operational (process upsets, fires and explosions, loss of utilities, spills, and releases), natural phenomena (earthquakes and storms), and security contingencies (bomb threat, hostage situation). For operational events, event frequency coupled with accident severity provide the criteria for emergency plan response.

Other potential hazardous release modes include fire, explosions, volcanic ashfall, weather, and security events. These events are evaluated based on the potential impact to operations and subsequent release of hazardous materials. Potential consequences to human health or the environment are the ultimate criteria for event classification and protective response actions. Additionally, prolonged small release rates have the potential to impact human health or the environment.

6.1 OPERATIONAL EMERGENCIES

Operational emergencies for each facility are discussed in the following section.

6.1.1 ETF Operational Emergencies

6.1.1.1 Loss of Utilities

Loss of utilities would interrupt the treatment processes but would not be classed as a WAC 173-303 or DOE Order defined emergency.

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6.1.1.2 Major Process Disruption/Loss of Plant Control

Process disruption/loss of plant control would interrupt the treatment processes but would not be classed as a WAC 173-303 or DOE Order defined emergency.

6.1.1.3 Pressure Release

The ETF has low pressure compressed air and steam systems. Loss of the compressed air or steam system(s) could result in loss of plant control or a process disruption. Process disruption/loss of plant control would interrupt the treatment processes but would not be classed as a WAC 173-303 or DOE Order defined emergency.

Compressed gas cylinders are used at the ETF. Failure of compressed gas bottles could cause flying debris hazards and are addressed as part of fire and/or explosion, Section 6.1.1.4

A process system pressure release is categorized as a condensate spray release. This is addressed as a radioactive/dangerous/mixed waste spill, Section 6.1.1.6.

6.1.1.4 Fire and/or Explosion

A fire/explosion could generate highly toxic and/or corrosive fumes. Flying debris might result from explosions and compressed gas cylinder failure. Process system disruption. loss of plant control, and breach of process system boundaries could result from the flying debris. Fire involving sulfuric acid might be classified as a Site Area Emergency.

6.1.1.5 Hazardous Material Spill

Hazards associated with process chemical spills include potential exposure to corrosive, oxidizing, or toxic materials, as well as potential environmental damage by the release of these materials to the air, water, or soil column. The hazards assessment required by DOE Orders identifies sulfuric acid and hydrogen peroxide spills as events that could pose significant risk or consequences to warrant emergency planning. Emergency classification criteria are provided in Table 3.

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Event	Emergency Action Level	Emergency Classification
Sulfuric acid spill	Entire contents of tank or tanker truck spill is released AND fire involving the contents of the tank or tanker truck AND field measurements at facility boundary (100 meters) indicate sulfuric acid concentrations of 2 milligrams per cubic meter or greater.	Site Area Emergency
Hydrogen peroxide spill	A spill of greater than or equal to 6800 liters (1800 gallons) AND field measurements at facility boundary indicate hydrogen peroxide concentrations of 25 parts per million or greater.	Site Area Emergency

Table 3 HAZARDOUS MATERIAL EMERGENCY CLASSIFICATION

6.1.1.6 Dangerous/Mixed Waste Spill

The ETF inventories include large quantities of process liquid, secondary powder waste, indirect waste, and dry active waste. The hazards assessment has evaluated that there are no events that could pose significant risk or consequences to warrant emergency planning. ETF has the potential for minor exposures to radioactive material, corrosive, oxidizing or toxic materials, as well as localized environmental damage by their release to air, water, or soil column. Therefore, response for dangerous/mixed waste releases are included in the scope of emergency planning.

6.1.1.7 Transportation and/or Packaging Incidents

A transportation and/or packaging incident involving chemicals, dangerous/mixed waste, or samples could result in exposure to hazardous materials (corrosive, oxidizer, toxic) and/or low levels of radioactivity, as well as potential environmental damage by their release to the air, water, or soil column.

6.1.1.8 Unusual, Irritating, or Strong Odors

A fire in any building could generate highly toxic and/or corrosive fumes (Section 6.1.1.4). A spill or spray release could release hazardous materials (Section 6.1.1.5). Response for the full range of these events is included in the scope of emergency planning.

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6.1.1.9 Radiological Material Release/Abnormal Radiation level

The ETF inventories include large quantities of process liquid, secondary powder waste, indirect waste, and dry active waste. Radioactive materials will accumulate in various treatment systems and in secondary waste powder. ETF has the potential for concentrating radioactive materials, therefore, response for abnormal radiation levels and radioactive material release are included in the scope of emergency planning. Criteria used to classify radiological emergencies is identified in Section 5.0.

6.1.1.10 Criticality

The hazards assessment concluded that criticality is not credible at the ETF.

6.1.2 LERF Operational Emergencies

6.1.2.1 Loss of Utilities

Loss of utilities would interrupt the pumping and automatic sampling processes but would not be classed as a WAC 173-303 or DOE Order defined emergency.

6.1.2.2 Major Process Disruption/Loss of Plant Control

Major process disruption/loss of plant control would interrupt the pumping and automatic sampling processes but would not be classed as a WAC 173-303 or DOE Order defined emergency.

6.1.2.3 Pressure Release

The are no high pressure systems at LERF. A piping system breach is addressed as a radioactive/dangerous/mixed waste spill (Section 6.1.2.6).

6.1.2.4 Fire and/or Explosion

A fire/explosion could generate highly toxic and/or corrosive fumes.

6.1.2.5 Hazardous Material Spill

Process liquid releases are addressed in Section 6.1.2.6. Small quantities of hazardous material could be used in maintenance and sampling activities. A spill of these materials would not be classed as a WAC 173-303 or DOE Order emergency. No emergency planning response is required.

6.1.2.6 Dangerous/Mixed Waste Spill

The LERF inventories include large quantities of process liquid. The hazards assessment has determined events listed in Table 4 could pose significant risks

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or consequences and warrant emergency planning. LERF has the potential for exposures to radioactive material, corrosive, oxidizing or toxic materials, as well as environmental damage by their release to air, water, or soil column. Therefore response for dangerous/mixed waste release are included in the scope of emergency planning.

Event	Emergency Action Level	Emergency Classification
Loss of basin cover	Significant portion of basin (>50%) is uncovered AND ammonia concentration in liquid > 7200 ppm AND field measurements at facility boundary (100 meters) indicate ammonia concentrations >25 ppm.	Alert Emergency
Process liquid spray	Breach in LERF piping occurs outside containment barriers, spilling greater that 37.8 liters (10 gallons) AND Ammonia concentration in liquid greater than 6800 ppm AND Field measurements at facility boundary (100 meters) indicate ammonia concentrations >25 ppm.	Alert Emergency
Process Liquid Spill	Spill of LERF liquid occurs outside containment barriers of greater that 37.8 liters (10 gallons) AND Ammonia concentration in liquid > 2500 ppm AND Field measurements at facility boundary (100 meters) indicate ammonia concentrations >25 ppm.	Alert Emergency
Process Liquid Spill	Spill of LERF liquid occurs outside containment barriers of greater that 280 liters (74 gallons) AND Ammonia concentration in liquid > 2500 ppm AND Field measurements at facility boundary (100 meters) indicate ammonia concentrations >200 ppm.	Site Emergency

Table 4 Dangerous/Mixed Waste Emergency Classification

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6.1.2.7 Transportation and/or Packaging Incidents

A transportation and/or packaging incident involving hazardous chemicals, radioactive/dangerous/mixed waste, or samples could result in exposure to hazardous materials (corrosive, oxidizer, toxic) and/or low levels of radioactivity, as well as potential environmental damage by their release to the air, water, or soil column.

6.1.2.8 Unusual, Irritating, or Strong Odors

Refer to Section 6.1.2.6.

6.1.2.9 Radiological Material Release/Abnormal Radiation level

Refer to Section 6.1.2.6.

6.1.2.10 Criticality

A criticality accident is not credible at LERF.

6.1.3 TEDF and GTS Operational Emergencies

6.1.3.1 Loss of Utilities

Loss of utilities would interrupt the pumping and automatic sampling processes but would not be classed as a WAC 173-303 or DOE Order defined emergency. No emergency planning response is required.

6.1.3.2 Major Process Disruption/Loss of Plant Control

Process disruption/loss of plant control could cause an inadvertent discharge of treated effluent or nontreated groundwater to a nonpermitted area. Discharge to an unauthorized area would not be classed as a WAC 173-303 or DOE Order defined emergency. No emergency planning response is required.

6.1.3.3 Pressure Release

There are no high pressure systems at the TEDF or GTS. A piping system breach is addressed in section 6.1.3.6.

6.1.3.4 Fire and/or Explosion

A fire/explosion could generate highly toxic and/or corrosive fumes.

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6.1.3.5 Hazardous Material Spill

No hazardous material is stored in the TEDF pump houses. Small quantities of hazardous material could be used in maintenance and sampling activities. This would not be classed as a WAC 173-303 or DOE Order emergency. No emergency planning response is required.

6.1.3.6 Dangerous/Mixed Waste Spill

Influent to TEDF is a nondangerous waste. TEDF and groundwater releases would not be classed as a WAC 173-303 or DOE Order emergency. No emergency planning response is required for this event. LWPF surveillance serves as leak detection.

6.1.3.7 Transportation and/or Packaging Incidents

There are no transportation and/or packaging activities at TEDF or GTS.

6.1.3.8 Unusual, Irritating, or Strong Odors

Unusual, irritating, or strong odors could be caused from highly toxic and/or corrosive fumes generated in a fire or a leak in the propane tank at TEDF Pump House #2. These events, by themselves, would not be classed as a WAC 173-303 or DOE Order emergency.

6.1.3.9 Radiological Material Release/Abnormal Radiation level

TEDF process liquid meets discharge limits. A groundwater release would not be classed as a WAC 173-303 or DOE Order emergency. No emergency planning response is required for this event.

6.1.3.10 Criticality

A criticality accident is not credible at TEDF or the GTS.

6.2 NATURAL PHENOMENA

6.2.1 Seismic Event

Depending on the magnitude of the event, severe structural damage could occur resulting in serious injuries or fatalities and the release of hazardous materials to the environment. Damaged electrical circuits and wiring could result in the initiation of fires.

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6.2.2 Volcanic Eruption/Ashfall

Though not expected to cause structural damage, the ash resulting from a volcanic eruption could cause shorts in electrical equipment and plug ventilation system filters.

6.2.3 High Winds/Tornados

High winds or tornados could cause structural damage to systems containing hazardous materials resulting in a release of the materials to the environment.

6.2.4 Flood

These facilities are not within the Columbia River flood plain therefore a flood is not a credible accident. Emergency planning is not required.

6.2.5 Range Fire

The hazards associated with a range fire are the same as those associated with a building fire plus potential site access restrictions and travel hazards such as poor visibility.

6.2.6 Aircraft Crash

In addition to the potential for serious injuries or fatalities, an aircraft . crash could result in the direct release of hazardous materials to the environment or cause a fire that could lead to the release.

6.3 SECURITY CONTINGENCIES

6.3.1 Bomb Threat

A bomb threat could be received by anyone who answers the telephone or receives mail. For a credible bomb threat, the facility should be placed in a safe configuration, if time permits, and then perform an evacuation. If a bomb explodes, the effects are the same as those discussed under fire and explosion.

6.3.2 Hostage Situation

A hostage situation can pose an emergency situation if there is the potential to adversely impact the facility. This can result in a loss of facility control (operators removed from their stations) or in the coercion of an employee to take some malevolent action.

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6.3.3 Suspicious Object

The major effect on the facility is that it should be placed in a safe configuration, if time permits, and then evacuated.

7.0 INCIDENT RESPONSE

Emergency action levels have been developed that provide clear classification and recognition criteria for emergency events in accordance with DDE Order guidance. The initial response to any emergency is to immediately protect the health and safety of persons in the immediate area. Identification of released material is essential to determine appropriate protective actions. Containment, treatment, and disposal assessment are secondary responses.

The following sections describe the process for implementing basic protective actions as well as descriptions of response actions for the events listed in Section 6.0 of this document. The *Hanford Facility Contingency Plan* (DDE/RL-93-75) provides a description of generic incident responses, describes the process for assessing and identifying dangerous waste, and describes the process for categorizing and classifying an incident.

Incident responses will be coordinated from the ETF control room or a designated alternate location.

7.1 PROTECTIVE ACTIONS RESPONSES

7.1.1 Evacuation

The objective of a facility evacuation order is to limit personnel exposure to hazardous materials or radioactive/dangerous/mixed waste by increasing the distance between personnel and the hazard. The scope of the evacuation includes evacuation of the facility because of an event at the facility as well as evacuation of the facility in response to a site evacuation order. Evacuation will be directed by the BED when conditions warrant and will apply to all personnel not actively involved in the event response or emergency plan-related activities.

The BED will initiate the evacuation by directing an announcement be made to evacuate along with the evacuation location over a public address system, facility radios, and, as conditions warrant, by activating the 200 Area site evacuation/take cover alarms by calling the POC using 911 (preferred) or 373-3800. Personnel proceed to a predetermined staging area (shown in Figure 2), or other safe upwind location, as determined by the BED. The BED will determine the operating configuration of the facility and identify any additional protective actions to limit personnel exposure to the hazard.

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Emergency organization personnel or assigned operations personnel will conduct a sweep of occupied buildings to ensure that all non-essential personnel and visitors have evacuated. For an immediate evacuation, accountability will be performed at the staging area. The BED will assign personnel as accountability aides and staging managers with the responsibility to ensure that evacuation actions are taken at all occupied buildings at the ETF or LERF complexes. All implementing actions executed by the aides/managers are directed by the emergency response procedures identified in Attachment A. When evacuation actions are complete, the aides/managers will provide a status report to the BED. The BED will provide status to the Site Emergency Director.

7.1.2 Take Cover

The objective of the take cover order is to limit personnel exposure to hazardous materials, or radioactive/dangerous/mixed waste when evacuation is inappropriate or not practical. Evacuation might not be practical or appropriate because of extreme weather conditions or the material release might limit the ability to safely evacuate personnel.

The BED will initiate the take cover by directing an announcement be made over the public address system, facility radios, and, as conditions warrant, by activating the 200 Area site take cover alarms by calling the POC using 911 (preferred) or 373-3800. Actions to complete a facility take-cover will be directed by the emergency response procedure in Attachment A. Protective actions associated with operations include configuring, or shutting down, the ventilation systems. Determination of additional take cover response is based on plant operating configuration, weather conditions, amount and duration of release, and other conditions, as applicable to the event and associated hazard. As a minimum, personnel exposure to the hazard will be minimized. The BED will assign personnel as accountability aides with responsibility to ensure that take-cover actions are taken at all occupied buildings at the ETF complex. All implementing actions executed by the aides/managers are directed by the emergency response procedure in attachment A. When take cover actions are complete the aides/manager will provide the BED with a status report.

7.2 RESPONSE TO OPERATIONAL EMERGENCIES

Operations activities to isolate, contain, and mitigate the event can be performed in parallel with classification and protective action implementation. The response procedures are structured to allow parallel activity with clearly established priorities. The division of actions and workload between various personnel is such that coordinated team response will result in the successful implementation of both emergency operating actions and emergency planning requirements. Specific event mitigation strategy for each type of accident is provided in the following sections.

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7.2.1 Loss of Utilities

The hazards assessment has determined that this occurrence does not pose significant risk to human health or the environment. This event is not classified as a WAC 173-303 or DOE Order defined emergency. No emergency planning is required.

7.2.2 Major Process Disruption/Loss of Plant Control

The hazards assessment has determined that this occurrence does not pose significant risk to human health or the environment. This event is not classified as a WAC 173-303 or DOE Order defined emergency. No emergency planning is required.

7.2.3 Pressure Release

The hazards assessment has determined that a pressure release does not pose significant risk to human health or the environment. This event is not classified as a WAC 173-303 or DOE Order defined emergency. No emergency planning is required. Hazardous material release and radioactive/dangerous/mixed waste releases are addressed in Section 7.2.5.

7.2.4 Fire and/or Explosion

In the event of a fire, the discoverer activates a fire alarm (preferred) or calls 911 or 373-3800. Automatic initiation of a fire alarm (through the smoke detectors and sprinkler systems) also is possible. Trained personnel may attempt to put out incipient fires with a portable fire extinguisher and then evacuate. Under no circumstances will personnel endanger personal health and safety to use portable fire extinguishers. At the ETF, the Control Room Operator, upon notification of a fire or a fire alarm, will attempt to place ETF in a stable condition by shutting down systems and then evacuate. Under no circumstances will personnel health and safety to shut down equipment. All other personnel will immediately evacuate the affected building or area.

An incident requiring evacuation of personnel or the summoning of emergency response units does not necessarily indicate that the contingency plan has been implemented.

A fire or explosion involving 92% sulfuric acid will be classified as a Site Emergency. Actions described in Section 7.2.5:2 will be performed for this event.

7.2.5 Hazardous Material, Radioactive/Dangerous/Mixed Waste Spills or Releases

The ETF and LERF have engineering controls to contain or minimize spills. These controls include, containment berms, dedicated spill control sumps, remote gauges

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and level indicators as well as spray shields on chemical pipe flanges. LWPF procedures provide alarm response and maintenance actions for leak detection equipment, surveillance of possible leak locations, and response actions for detected spills.

Spills can result from many sources including process leaks, container spills or leaks, damaged packages or shipments, or personnel error. Spills of mixed waste are complicated by the need to deal with the extra hazard induced by the presence of radioactive materials.

Hazardous material and dangerous and/or mixed waste releases fall into one of two categories: minor spills or major spills. The criteria to determine whether a spill or release is minor are described in the *Hanford Facility Contingency Plan*, (DDE/RL-93-75), Section 5.2.

A spill or release of hazardous material or dangerous/ waste is considered "minor" if <u>all</u> of the following are true:

- The spill or release does not threaten human health (e.g., an evacuation is not necessary)
- The spill does not threaten the environment
- Non-emergency response personnel have received training to mitigate the spill and appropriate personal protective equipment is available
- The composition of the material or waste is known or can be quickly determined from label, manifest, MSDS, or disposal request information.

If one or more of the foregoing conditions are not met, responses are performed as described for the major spill.

7.2.5.1 Response To Minor Spills or Releases

The TSD unit personnel generally perform immediate cleanup of minor spills or releases using absorbents and emergency equipment. Personnel detecting such spills or releases contact the ETF control room for notification and to ensure notification of the BED. Responses to spills or releases occurring within facility boundaries are described in facility specific procedures. Response to minor spills generally does not require the implementation of the contingency plan.

7.2.5.2 Response To Major Spills or Releases

If a major spill or release is discovered, the discoverer:

1. Notifies the ETF control room and evacuates to a safe area.

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 Remains available for consultation with the BED, HFD, or other emergency response personnel

The control room operator:

- 1. Uses the public address (PA) system to notify the facility occupants of the event \cdot
- 2. Notifies the BED/HFD and relays information received from the event scene
- 3. Places the facility in a safe condition per plant operations procedures
- 4. Remains available to support further notification and response activities

The BED performs or arranges personnel to:

- Coordinate response activity and establishes a command post at a safe location
- Obtain all available information pertaining to the incident and determines if the spill or release warrants implementation of the contingency plan in accordance with Section 4.0.
- 3. Determine need for assistance from outside agencies and arranges for their mobilization and response
- Initiate the appropriate announcements, if building or area evacuations are necessary
- 5. Arrange for care of any injured persons
- Request activation of the affected area emergency sirens/crash alarm system if a threat to surrounding facilities
- 7. Provide for event notification
- 8. Maintain access control at the incident site by keeping unauthorized personnel and vehicles away from the area. Security personnel can be used to assist in site control if control of the boundary is difficult. In determining controlled access areas, considers environmental factors such as wind velocity and direction
- 9. Arrange for proper remediation of the incident after evaluation.
- Remain available for HFD, Hanford Patrol, and other authorities on the scene and provides all required information

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- 11. Enlist the assistance of alternate BED(s), if around-the-clock work is anticipated
- Refer media inquiries to the Media Relations/Communications offices of the contractors or D0E-RL.
- 13. Ensure the use of proper protective equipment, remedial techniques (including ignition source control for flammable spills), and decontamination procedures by all involved personnel, if remediation is performed by LERF/ETF personnel.
- Remain at the command post to oversee activities and to provide information, if remediation is performed by the HFD Hazardous Materials Response Team or other response teams
- Ensure proper containerization, packaging, and labeling of recovered spill materials and over packed containers
- Ensure decontamination (or restocking) and restoration of emergency equipment used in the spill remediation before resuming operations
- 17. Provide required reports after the incident.

7.2.5.3 Damaged, Unacceptable Hazardous Material, Dangerous and/or Mixed Waste Shipments

When a damaged shipment of hazardous material or dangerous waste arrives at the ETF and the shipment is unacceptable for receipt, actions will be taken to rectify the problem. If required, actions described in Section 7.2.5 are taken.

7.2.6 Fume Hazards

If an unusual, irritating, or strong odor is detected, and the discoverer has reason to believe that the odor might be the result of an uncontrolled release of a toxic or dangerous material, the discoverer reports to the control room and actions identified in Section 7.2.5 are taken.

7.2.7 Radiological Material Release

At a minimum, actions described in Section 7.2.5 are taken. Abnormal radiation actions also may be implemented if conditions are warranted.

7.2.8 Criticality

The hazards assessment has determined that a criticality is not credible for ETF or LERF. No emergency planning is required.

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7.3 PREVENTION OF RECURRENCE OR SPREAD OF FIRES, EXPLOSIONS, OR RELEASES

The BED, in coordination with emergency response organizations, takes the steps necessary to ensure that a secondary release, fire, or explosion does not occur. The following actions are taken:

- Isolate the area of the initial incident by shutting off power, closing off ventilation systems, etc., to minimize the spread of a release and/or the potential for a fire or explosion
- Inspect containment for leaks, cracks, or other damage
- Inspect for toxic vapor generation
- Remove released material and waste remaining inside of containment structures as soon as possible
- Contain and isolate residual waste material using dikes and adsorbents
- Cover or otherwise stabilize areas where residual released materials remain to prevent migration or spread from wind or precipitation run-off
- Install new structures, systems, or equipment to enable better management of hazardous materials or dangerous waste
- Reactivate adjacent operations in affected areas only after cleanup of residual waste materials is achieved.

7.4 RESPONSE TO NATURAL PHENOMENA

If other emergency conditions arise as a result of a natural phenomena event, response would be appropriate for the condition created. For example: A fire due to lightning would initiate the fire response actions and a spill of hazardous material due to an earthquake would initiate spill response actions.

7.4.1 Seismic Event

The Hanford emergency response organization's primary role in a seismic event is coordinating the initial response to injuries, fires, and fire hazards and acting to contain or control radioactive and/or hazardous material releases.

Individuals should remain calm and stay away from windows, steam lines, and hazardous material storage locations. Once the shaking has subsided, individuals should evacuate carefully and assist personnel needing help. The location of any trapped individuals should be reported to the BED or is reported to 911 or 373-3800.

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The BED takes whatever actions are necessary to minimize damage and personnel injuries. Actions include the following:

- Coordinating searches for personnel and potential hazardous conditions (fires, spills, etc.)
- 2. Conducting accountability.
- 3. Securing utilities and facility operations.
- 4. Arranging rescue efforts, and notifying 911 or 373-3800 for assistance.
- Assembling damage assessment teams to perform facility inspections in accordance with the post-natural phenomena hazards inspection plan and procedure.
- 6. Determining if hazardous materials were released.
- 7. Determining current local meteorological conditions.
- Warning other facilities and implement protective actions if release of hazardous materials poses a danger.
- Providing personnel and resource assistance to other facilities.

7.4.2 Volcanic Eruption/Ashfall

When notified of an impending ashfall, the BED will implement measures to minimize the impact of the ashfall, such as:

- 1. Installing filter media over building ventilation intakes.
- Installing filter media or protective coverings on outdoor equipment that could be adversely affected by the ash (diesel generators, equipment rooms etc.).
- 3. Shutting down some or all operations and processes.
- Sealing secondary use exterior doors.
- 5. Releasing all but essential personnel to go home.

 Assembling damage assessment teams to perform facility inspections in accordance with the post-natural phenomena hazards inspection plan and procedure.

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7.4.3 High Winds/Tornados

On notification of impending high winds, the BED takes steps necessary to secure all outside doors and windows, and secure all outdoor waste and hazardous material handling activities. All personnel are warned to use extreme caution when entering or exiting the building.

7.4.4 Flood

The hazard assessment determined that flooding at the LERF/ETF is not credible. No emergency planning response is required.

7.4.5 Range Fire

Responses to range fires are handled by preventive measures (i.e., keeping hazardous material and waste accumulation areas free of combustible materials such as weeds and brush). If a range fire breaches the facility boundary, the response is as described for a fire.

7.4.6 Aircraft Crash

Response to an aircraft crash would be appropriate for the condition created. For example: A fire due to explosion or electrical shorts would initiate the fire response actions specified in Section 7.2.4.

7.5 SECURITY CONTINGENCIES

7.5.1 Bomb Threat/Explosive Device

7.5.1.1 Telephone Bomb Threat

Personnel receiving telephoned threats attempt to get as much information as possible from the caller. Upon conclusion of the call, notify the BED and Security.

The BED evacuates the facility and questions personnel at the staging area regarding any suspicious objects in the facility.

When Security personnel arrive, follow their instructions.

7.5.1.2 Written Threat

Receivers of written threats handle the letter as little as possible and notify the BED and Security. Depending on the content of the letter, the facility may or may not be evacuated. The letter is turned over to Security personnel and their instructions are followed.

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7.5.2 Hostage Situation/Armed Intruder

The discoverer of a hostage situation or armed intruder reports the incident to the POC via 911 or 373-3800 and to the BED, if possible. The BED, after conferring with Security personnel, may covertly evacuate areas of the facility not observable by the hostage taker(s)/intruder. No alarms will be sounded.

Security will determine the remaining response actions and will activate the Hostage Negotiating Team, if necessary.

7.5.3 Suspicious Object

The discoverer of a suspicious object notifies the BED and to the POC via 911 or 373-3800, if possible, and ensures that the object is not disturbed.

The BED will evacuate the facility and (based on the description provided by the discoverer) will attempt to determine the identity or owner of the object. This can be done by questioning facility personnel at the staging area.

If the identity/ownership of the object cannot be determined. Security will assume command of the incident. The canine unit will be used to determine if the package contains explosives. If there is a positive indication of explosives or it cannot be assured that there are no explosives, then the Richland Police Department's Emergency Ordinance Disposal Team will be dispatched to the facility to properly dispose of the device.

8.0 TERMINATION OF EVENT, INCIDENT RECOVERY, AND RESTART OF OPERATIONS

The Hanford Facility Contingency Plan (DOE/RL-93-75), Section 6.0, describes these considerations. The extent by which these actions are employed is based upon the incident classification of each event. In addition, information included in the Hanford Facility Contingency Plan, DOE/RL-93-75, considers the management of incompatible wastes that might apply.

8.1 TERMINATION OF EVENT

For events where the DOE-RL Emergency Operations Center (RL-EOC) is activated, the DOE-RL Emergency Manager has the authority to declare event termination. This decision is based on input from the BED, Incident Commander, and other emergency response organization members. For events where the RL-EOC is not activated, the BED in conjunction with the Incident Commander will declare event termination.

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8.2 INCIDENT RECOVERY AND RESTART OF OPERATIONS

A recovery plan is developed when necessary. A recovery plan is needed following an event where further risk could be introduced to personnel, the facility, or the environment through recovery action and/or to maximize the preservation of evidence. Depending on the magnitude of the event and the effort required to recover from the event, recovery planning might involve personnel from DDE-RL and other contractors. If a recovery plan is required, it is reviewed by appropriate personnel and approved by a Recovery Manager before restart. Restart of operations is performed in accordance with the approved plan.

If this plan was implemented for a WAC emergency (refer to Section 4.0), the Washington State Department of Ecology must be notified before operations can resume. Section 9.0 of the *Hanford Facility Contingency Plan* (DOE/RL-93-75), discusses different reports to outside agencies. This notification is in addition to other required reports and must include information documenting the following conditions:

- 1. There are no incompatibility issues with the waste and released materials from the incident.
- All the equipment has been clean, fit for its intended use, and placed back into service. The notification can be made via telephone conference. Additional information that Ecology requests regarding these restart conditions can be included in the required 15-day report identified in the Hanford Facility Contingency Plan (DOE/RL-93-75).

For emergencies not involving activation of the RL-EOC, the BED ensures that conditions are restored to normal before operations are resumed. If the Hanford Site Emergency Organization was activated and the emergency phase is complete, a special recovery organization could be appointed at the discretion of DDE-RL to restore conditions to normal. This process is detailed in DDE-RL and contractor emergency procedures. The makeup of this organization depends on the extent of the damage and its effects. The onsite recovery organization will be appointed by the appropriate contractor's management.

8.3 INCOMPATIBLE WASTE

After an event, the BED or the onsite recovery organization ensures that no waste that might be incompatible with the released material is treated, stored, and/or disposed of until cleanup is completed. Cleanup actions are taken by facility personnel or other assigned personnel. The *Hanford Facility Contingency Plan* (DOE/RL-93-75), Section 6.3, describes actions to be taken.

Waste from cleanup activities is designated and managed as newly generated waste. A field check for compatibility before storage is performed as necessary.

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Incompatible wastes are not placed in the same container. Containers of waste are placed in storage areas appropriate for their compatibility class.

If incompatibility of waste was a factor in the incident, the BED or the onsite recovery organization ensures that the cause is corrected.

8.4 POST EMERGENCY EQUIPMENT MAINTENANCE AND DECONTAMINATION

All equipment used during an incident is decontaminated (if practicable) or disposed of as spill debris. Decontaminated equipment is checked for proper operation before storage for subsequent use. Consumable and disposed materials are restocked. Fire extinguishers are recharged or replaced.

The BED ensures that all equipment is cleaned and fit for its intended use before operations are resumed. Depleted stocks of neutralizing and absorbing materials are replenished, self-contained breathing apparatus are cleaned and refilled, protective clothing is cleaned or disposed of and restocked, etc.

9.0 EMERGENCY EQUIPMENT

Hanford Site emergency resources and equipment are described and listed in the *Hanford Facility Contingency Plan* (DOE/RL-93-75), Section 7.0.

9.1 FIXED EMERGENCY EQUIPMENT

FIXED EMERGENCY EQUIPMENT		
ТҮРЕ	LOCATION	CAPABILITY
Safety shower/eye wash stations (ETF only)	 2025E Rm 122 Decon Station 2025E South Wall of Process Area 2025E Rm 134 Outside south 2025E near acid/caustic tanks Outside at Load-in station 	Assist in flushing chemicals/materials from the body and/or eyes and face of personnel.
Wet pipe sprinkler (ETF only)	Throughout the ETF except those areas protected by pre-active sprinklers.	Assist in the control of a fire.
Preactive sprinkler (ETF only)	Control room, communications room, electrical equipment room	Assist in the control of a fire. Maintained dry to prevent accidental damage to equipment.

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Fire alarm pull boxes (ETF only)	All high traffic areas in operations administration and support areas, truck bay, and process area	Activate the local fire alarm
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9.2 PORTABLE EMERGENCY EQUIPMENT

	PORTABLE EMERGENCY EQUIPMENT	
TYPE LOCATION CAPABILITY		CAPABILITY
Fire extinguisher ABC type	Throughout ETF (Administrative/Support areas), LERF, and TEDF	Fire suppression for Class A, B, and C fires
Fire extinguisher BC type	Throughout ETF (process area and electrical room)	Fire suppression for Class B and C fires
Portable safety showers and Eye Wash Stations	As needed for special evolutions and maintenance	Assist in flushing chemicals/ materials from the body and/or eyes and face of personnel.

9.3 COMMUNICATIONS EQUIPMENT/WARNING SYSTEMS

	COMMUNICATIONS EQUIPMENT	
TYPE	LOCATION	CAPABILITY
Fire alarms (ETF only)	Corridors, locker rooms, process area, drum storage, and truck bay	Audible throughout ETF
Take cover/evacuation	Site Emergency Alarm System	Audible outside buildings and inside administrative buildings
Public address system (ETF Only)	Throughout the ETF	Audible throughout ETF
Portable radios	Operations and maintenance personnel	Communication to control room

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II		
Telephone	ETF - control room, 2025E, 2025EA offices, MO-269. LERF - MO-727 and 242A171 instrument building TEDF - 225E(pump house 1), 225W (pump house 2), 6653 (sample building), 6653A (pump house 3)	Internal and external communications. Allows notification off outside resources (POC, HFD, Hanford Patrol, etc)
Crash alarms (ETF only)	Control room, 2025EA Rm 101	Audible in ETF control room
Process alarm (ETF only)	ETF - beacon near IX columns	Visible from ETF control room

9.4 PERSONAL PROTECTIVE EQUIPMENT

PERSONAL PROTECTIVE EQUIPMENT		
ТҮРЕ	LOCATION	CAPABILITY.
Self contained breathing apparatus (SCBA)	5 - 2025E Rm 122 2 - 2025E Control room area 2 - Outside southeast 2025E.	Breathable air for initial response to emergency, and recovery activities when required
Acid suits	3 each included in the spill response cabinets in 2025E.	Chemical protection for personnel during containment and isolation.
Respirators	2025E Rm 203	Filtered air for recovery of known hazards.

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9.5 SPILL CONTROL AND CONTAINMENT SUPPLIES

SPILL KITS AND SPILL CONTROL EQUIPMENT		
ТҮРЕ	LOCATION	CAPABILITY
Spill bag	 TEDF 6653 Disposal Sampling Building. 90-day storage CONEX East of 2025E building 	Support containment and cleanup of 6 gallons of acids or bases.
Drum spill kit	 2 - 2025E building in process area. 1 - M0-727 Change Trailer 	Support containment and cleanup of 51 gallons of acids or bases.
Spill cart	2 - 2025E building in process area.	Support containment and cleanup of 77 gallons of acids or bases.
Spill response cabinet	 2025E Rm 122 outside southeast side of 2025E. 	Support equipment for spill response.
Spill bag	1 - 2025E Rm 112 1 - 2025E upper level process area.	Support containment and cleanup of 10 gallons of acids or bases.

9.6 EMERGENCY RESPONSE CENTER

For emergencies not requiring evacuation, the BED and support personnel will assemble in the ETF control room, 242-A Evaporator control room, or other location as identified by the BED.

10.0 COORDINATION AGREEMENTS

DOE-RL has established a number of coordination agreements, or memoranda of understanding (MOU) with various agencies to ensure proper response resource availability for incidents involving the Hanford Site. A description of the agreements is contained in Section 8.0 of the *Hanford Facility Contingency Plan* (DDE/RL-93-75).

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11.0 REQUIRED REPORTS

Three types of written post-incident reports are required for incidents on the Hanford Site. The reports are summarized in the Hanford Facility Contingency Plan (DOE/RL-93-75), Section 9.0.

12.0 PLAN LOCATION

Copies of this plan are maintained at the following locations:

- ETF control room
- 242A Evaporator control room
- Operations Managers office (Building 2025EA, room 101)
- 200 LWPF regulatory file

13.0 BUILDING EMERGENCY ORGANIZATION

BUILDING EMERGENCY DIRECTOR (BED)	TITLE	WORK LOCATION	WORK PHONE
PRIMARY	Shift Operation Manager (SOM)	2025E Building - ETF control room or 242A Evaporator control room	373-9000 . 373-2737
ALTERNATE	Operations Manager	2025EA Building, room 101	373-4565

The complete building emergency organization listing of positions, names, work locations, and telephone numbers for the ETF is maintained in a separate, internally controlled, facility document. Copies are distributed to appropriate facility locations and to Emergency Preparedness. In addition, work and home telephone numbers of the BEDs and alternates are available from the POC (373-3800) in accordance with Hanford Facility RCRA Permit, Dangerous Waste Portion, General Condition II.A.4.

14.0 REFERENCES

DOE Order DOE 0 232.1. "Occurrence Reporting and Processing of Operations Information"

DOE Order 5500.1B, "Emergency Management Systems"

DOE/RL-93-75, Hanford Facility Contingency Plan

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29 CFR 1910.120, Hazardous Waste Operations and Emergency Response

WAC 173-303, "Dangerous Waste Regulations." Washington Administrative Code, Washington State Department of Ecology, Olympia, Washington.

NIOSH, *Pocket Guide to Chemical Hazards*, National Institute of Occupational Safety and Health, U.S. Department of Health and Human Resources, Public Health Service, Centers for Disease Control, Washington, D.C.

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ATTACHMENT A

Listing of Procedures and Guides

A list of facility specific emergency response procedures and guides is maintained at the facility and will be provided upon request.

APPENDIX 8A

TRAINING PLAN

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Dangerous Waste Training Plan

Approved by:

D. W. Lindsey, Manager 200 Area Liquid Waste Processing Facilities

1.0 PURPOSE

This document outlines the Dangerous Waste Training Program (DWTP) for the 200 Area Liquid Waste Processing Facilities (LWPF) organization. The 200 Area Effluent Treatment Facility (ETF), Liquid Effluent Retention Facility (LERF), and 242-A Evaporator are under the control of LWPF and each is permitted as a Treatment, Storage, or Disposal (TSD) unit on the Hanford Facility.

The program is designed for compliance with the requirements of Washington Administrative Code (WAC) 173-303-330 and Title 40 Code of Federal Regulations (CFR) 264.16 for the development of a written dangerous waste training program. These training requirements were determined after assessment of employee duties and responsibilities.

2.0 SCOPE

This Dangerous Waste Training Plan applies to personnel who perform work at, or in support of, the 200 Area Effluent Treatment Facility (ETF), Liquid Effluent Retention Facility (LERF) and the 242-A Evaporator. This Dangerous Waste Training Plan defines the minimum required training for employees to perform tasks associated with dangerous waste(s).

The LWPF training program is designed to ensure that employees who operate and maintain LWPF systems/equipment receive the training they require to safely operate and maintain LWPF systems/equipment in a effective and environmentally sound manner. In addition to preparing employees to operate and maintain LWPF equipment/systems under normal conditions, this training program ensures that employees are prepared to respond in a prompt and effective manner should off-normal or emergency conditions occur.

3.0 DEFINITION

NONE

4.0 **RESPONSIBILITIES**

4.1 Training Manager

The LWPF Facility Manager has overall responsibility for all training required by Washington Administrative Code (WAC) 173-303-330 and Condition II.C of the Hanford RCRA Permit (DW portion) at LWPF. To meet the training requirements in WAC 173-303-330(1)(a), the training director position is described in Chapter 8.0 of DOE/RL-91-28, Hanford Facility Dangerous Waste Permit Application, General Information Portion.

4.2 Facility Management (including Team Leaders)

Develop and administer a comprehensive training program for employees.

Ensure annual training on dangerous waste(s) is provided to affected employees.

Ensure all applicable training requirements are met.

4.3 Operations Management

Ensure Operations personnel are trained.

Ensure required certifications are maintained.

4.4 Training Personnel

Maintain knowledge in the area of waste management, including updates.

Re-evaluate training courses at least every year to ensure waste training requirements continue to be met.

4.5 Employees

Handle dangerous waste(s) in accordance with applicable regulations.

Minimize personal exposure to all dangerous wastes.

Inform management of problems concerning dangerous waste handling / storage / disposal.

5.0 PROCEDURE

The LWPF Dangerous Waste Training Program is implemented based on training requirements related to job responsibilities. Personnel affected by the Dangerous Waste Training Program complete those portions of the training curriculum delineated in the company level environmental compliance manuals, and tracked by the (computerized) Training Matrix (TMX), <u>prior to</u> <u>performing unsupervised work in a facility</u>.

Personnel new to LWPF, or changing positions within LWPF, complete the required dangerous waste training within six months of the assignment. Personnel who have not completed required training are permitted to perform work requiring handling dangerous wastes at LWPF only under the supervision of a trained employee. LWPF operations management is responsible for ensuring that all operations personnel are trained and required certifications are maintained.

5.1 Identification of Training

The required training is specified by the employee's specific job duties as determined by a job analysis or management assessment. Training requirements for individual operations personnel can be found in TMX. Required training is based on worker positions/job titles described in this plan and listed on Attachment 3, Required LWPF Training.

5.2 Dangerous Waste Worker Positions

Employee duties have been categorized within six worker positions. In the event personnel duties and responsibilities overlap and fall into more than one position, the employee will complete the training requirements for each position. The six worker positions are: 1) All Employee, 2) General Worker, 3) Advanced General Worker, 4) General Manager, 5) General Shipper, and 6) Waste Designator.

The level of training is determined by the duties associated with each worker position. The description of job duties for each position can be matched to individual job titles held by employees at the Hanford Site. The determining factor for placing a specific worker within any of the worker positions are the duties of the worker's job.

5.3 Job Title and Descriptions

Each employee is assigned a job title and job description. The job descriptions include requisite skills, work experience, education, and other qualifications, and a brief list of duties and/or responsibilities for each position. Work experience, education, and other qualifications required for each position are maintained by the company's human resources department.

In the following sections, brief job titles and job descriptions of employees associated with dangerous waste management at LWPF are listed within the appropriate position.

1) All Employees

Employees included in this position are those personnel who do not fall into one of the other five positions and have no duties or responsibilities directly associated with dangerous waste. The types of personnel in this position typically include Secretaries, Clerks, and Oversight (example: Quality Assurance) Personnel.

Most non-Hanford Facility Personnel will be categorized as All Employees since they generally tour, provide oversight, or are brought on site for interviews. Other non-Hanford Facility Personnel who gain access to the LWPF facilities to complete work in controlled areas but do not become involved in the management of dangerous or mixed waste will be categorized as All Employees.

2) General Worker

Facility or support personnel with limited dangerous waste management duties, which include general activities associated with the generation of waste, facility maintenance or modification, are categorized as General Workers. Job duties and responsibilities for general workers are not unit specific.

Hanford Facility personnel categorized as General Workers may be assigned duties and responsibilities for:

Placing waste generated into pre-approved containers and filling out log sheets where applicable.

Completing radiological surveys of dangerous or mixed wastes.

The loading of packaged containers onto trucks or movement of containers.

Responding to a spill or release of known contents where the duties and responsibilities are limited to containing the spill/release, returning the drum to an upright position, and placing the known spilled material or waste into a pre-approved container.

Applying advanced container markings or labels based on direction from an Advanced General Worker, General Manager, or General Shipper.

Support organizations management and technical support personnel assist management in the safe, effective, efficient, and environmentally acceptable operation and maintenance of the facilities. Personnel who function as general workers may include, but are not limited to: maintenance personnel, radiological control technicians (RCTs), craftspeople, supervisors of general workers, truck drivers, and laboratory personnel.

3) Advanced General Worker

Nuclear Process Operators (NPOs) and designated environmental engineering personnel are categorized as advanced general workers, based on job duties. Their activities either generate and manage dangerous waste or they operate the facility systems and processes.

Examples of the duties and responsibilities of an Advanced General Worker for management of dangerous waste in containers include: container inspection, determining advanced container markings and preparing container log sheets, completing waste inventories, sampling of waste, responding to spills and releases of waste in accordance with approved procedures, etc.

LWPF NPOs responsibilities and duties include:

- Operate the ETF, LERF and 242-A Evaporator facilities.
- Package and transport waste samples.
- Perform sampling.
- Conduct routine inspections.
- Provide surveillance.
- Respond to facility alarms.
- Respond to abnormal and/or emergency conditions.

4) General Manager

Personnel identified as General Managers coordinate, direct and oversee the work of general or advanced general workers in the management of dangerous waste or in the operation and control of the facility. Other duties may include command responsibilities during emergency events requiring implementation of the contingency plan. The personnel at LWPF who may be categorized as General Managers include: the Operations Manager (OM), Shift Operations Managers (SOMs), Environmental Compliance Officer (ECO), Cognizant Engineers (Cogs), Persons In Charge (PICs), and Hazardous Material Coordinator (HMC). The TMX identifies employees currently filling these positions.

- a) Operations Manager (OM) responsibilities include:
 - Supervise, coordinate, and direct the activities of the SOMs.
 - Maintain control over the LWPF unit operations in accordance with established operating procedures and policies, DOE Orders, and Federal and State regulations.
 - Direct, control, and coordinate the storage and transfer of dangerous waste.
 - Comply with LWPF discharge permits, delisting, and operating limits.
 - Provide guidance to SOMs during abnormal or emergency conditions.

b) Shift Operations Managers (SOMs) responsibilities include:

- Supervise and coordinate LWPF operation and maintenance activities.
- Maintain control of LWPF unit operations in accordance with established policies and operating procedures, DOE Orders, and Federal and State regulations.
- Conduct pre-job safety meetings with personnel.
- Maintain operational records.
- Review and revise LWPF operations procedures.
- Recognize and respond to abnormal and/or emergency conditions.
- Supervise the storage, handling, and transfer of dangerous waste.
- Comply with LWPF discharge permit/Delisting requirements and operating limits.

- c) Environmental Compliance Officer (ECO) responsibilities include:
 - Maintain Operations Management awareness of environmental compliance requirements and issues.
 - Provide support to ensure compliance with applicable environmental rules and regulations.
 - Serve as LWPF's liaison on environmental issues and permits.
 - Advise LWPF management of emerging environmental. requirements and policies, and recommend implementation strategies to ensure compliance.
 - Ensure compliance with LWPF discharge permit/Delisting requirements.

d) Cognizant Engineers (Cog Engs) responsibilities include:

- Ensure emergency and monitoring equipment, process equipment, procedures, designs, etc., comply with DOE Orders, Federal and State regulations, national standards, and applicable engineering procedures and management standards.
- Issue and maintain operating documentation, operating procedures, flowsheets, sample schedules, specifications, process test plans and procedures, operational safety requirements, etc.
- Perform evaluations of LWPF unit process to ensure compliance with process control requirements and discharge permits/Delisting.

 Prepare and approve engineering design documents and drawings in compliance with applicable policies, procedures, and instructions per national standards and codes.

- Provide technical assistance for hazardous material and dangerous waste spill response.
- Person In Charge (PIC) responsibilities include:
 - Provide in-field direction of tasks in progress.
- e)

- f) Hazardous Material Coordinator (HMC) responsibilities include:
 - Create and maintain Satellite Accumulation Areas (SAAs), as needed, for maintenance of waste generated at LWPF in accordance with applicable requirements.
 - Supervise and coordinate dangerous waste storage and transfer.
 - Provide approved storage containers and applicable markings.
 - Interface with other organizations to ensure proper and timely disposal of waste.
 - Prepare and maintain applicable waste handling documentation in accordance with DOE Orders and Federal and State regulations.
 - Ensure non-regulated alternatives are used whenever possible.
 - Provide review and waste disposition instructions as required.

5) General Shipper

General Shippers prepare and sign waste movement documentation for on-site and off-site shipments of dangerous waste. Additionally, at LWPF they are involved in the development and approval of hazardous waste procedures. Designated environmental engineering personnel are categorized as General Shippers as noted on the TMX. The Environmental Compliance Officer should also meet all training requirements for a General Shipper.

6) Waste Designator

Personnel who perform and/or complete waste designations at unit/buildings are categorized as waste designators under the RCRA training program.

5.4 Type and Amount of Training

This section provides an overview of dangerous waste management and job-specific training provided to employees in job titles and positions discussed in the previous sections. In addition to normal operating conditions, all employees are trained on emergency equipment, systems, and procedures to include the following, as applicable to meet the requirements in WAC 173-303-330(1)(d):

- Procedures for using, inspecting, and maintaining emergency response equipment.
- Automatic and manual waste feed cut-off systems.
- Communication and alarm systems.
- Response to fires and explosions.
- Response to dangerous waste contamination incidents and spills.
- Shutdown of operation.

LWPF uses existing courses to the maximum extent practical, ranging from introductory to task specific waste training. Attachment 1 gives listing of the classes, with brief descriptions, required for the stated job classifications and Attachment 2 provides a matrix of job positions and required training.

Support organization employees are also required to complete identified facility specific training applicable to their involvement with dangerous waste management. LWPF Managers and Team Leaders are responsible for identifying individual employee training requirements, in accordance with this plan, and for ensuring training requirements are met.

1) Training for Emergency Response

Federal and state regulations require all employees be able to respond effectively to emergencies and employees be familiar with emergency procedures, emergency equipment, and emergency systems. Specific topics required by federal and state dangerous waste regulations are addressed throughout the Dangerous Waste Training Program and are included in the following training, as applicable:

- Waste Management Awareness.
- Facility Specific Orientation, including Building Emergency Plan.
- Facility Emergency and Hazard Information Checklist.
- Nuclear Process Operator certification.
- Building Emergency Director training.

2) Non-Hanford Facility Personnel Training

Non-Hanford Facility personnel who will be performing unsupervised work at LWPF must complete training required by WAC 173-303 and 40 CFR 264.16.

Non-Hanford Facility personnel who not will be performing un-supervised work in a facility, such as touring a facility, must be escorted by facility personnel with the training required for the tasks.

The TSD Unit Manager is responsible for ensuring non-Hanford Facility personnel meet applicable access requirements before granting access to the facilities.

5.5 Relevance of Training to Positions

The dangerous waste training program for LWPF employees was developed after reviewing state and federal regulations and the completion of a job analysis for selected positions. Tasks performed by employees were identified and evaluated to determine training requirements. In addition, training needs are evaluated continually in relation to current state and federal regulations.

The LWPF Dangerous Waste Training Program ensures personnel responsible for waste handling are trained properly to perform the job duties pertinent to the handling, storage, treatment, and/or disposal of dangerous wastes.

5.6 Conduct of Training

Training is provided using classroom instruction, On-the-Job Training, and/or computer based training methods. Training is developed and provided by personnel knowledgeable in dangerous waste management policies/procedures.

Hanford Facility personnel shall maintain appropriate knowledge and skills by reviewing training material, required reading, self-paced instruction manuals, lessons learned, group discussions, continued training, etc. Employees requiring certification are required to recertify annually or biennially, as applicable.

5.7 Documentation of Training

Classroom training is documented on course completion rosters, which are signed by students attending the course. Written examinations are signed by the student at the time of taking the exam and when reviewed with the instructor who grades the examination.

Training record files for LWPF employees are stored in the TMX computer database, which is accessed by the Facility Records Specialist. A report is generated from the database to inform facility management when an employee's training is within 90 days of expiration. An example of a TMX report is included in Attachment 3. Copies of completed TSD unit-specific training certifications/qualifications are available from the LWPF Training Department. Additional information regarding training records can be accessed through the Training Records and Information (TRI) system. The TRI system is managed by the Hanford Training Records organization. HNF-IP-0931, 200 Area Liquid Waste Processing Facilities Administrative Policies Dangerous Waste Training Plan

Training record summaries for support organization employees are also stored in the TRJ system. Training records for former employees are kept on the TRI system for three years from the date the employee last worked at LWPF. Original signed and dated training records are maintained by the Hanford Training Records organization. These records are transferred quarterly to the Records Holding Facility in Richland, Washington. After approximately one year at the Records Holding Center, the original training records are archived.

1) Access of Training Records

When a training record is requested during an inspection, an electronic data storage record will be provided. If an electronic data storage record does not satisfy the inspection concern, a hard copy training record will be provided. Training records of former employees may not be readily available to facility personnel and may require a representative from the Training Records organization to access this information.

2) Determining Current Training Status

The electronic data storage training record, coupled with this training plan, will give the ability to quickly determine the training status of personnel in the field.

3) Personnel List

A list of personnel for Advanced General Workers, General Managers, General Shippers and Waste Designators is maintained on TMX, including the direct link between these positions and the individuals filling the positions. The TMX is updated quarterly.

6.0 REFERENCES

The following documents were used in the development of this DWTP:

WAC 173-303-330, Washington Administrative Code, Dangerous Waste Regulations
Title 40 Code of Federal Regulations 264.16, Personnel Training
1992, HAMTC Agreement
Hanford Facility RCRA Permit, Dangerous Waste Portion
Hanford Facility Dangerous Waste Permit Application, General Information Portion (DOE\RL-91-28)

7.0 ATTACHMENTS

ATTACHMENT 1. RCRA TRAINING PROGRAM COURSE DESCRIPTIONS ATTACHMENT 2. REQUIRED LWPF TRAINING ATTACHMENT 3. EXAMPLE OF TMX DATABASE REPORT

ATTACHMENT 1. RCRA TRAINING PROGRAM COURSE DESCRIPTIONS

The following list of courses constitutes the RCRA training program courses as determined by (1) the Dangerous Waste Regulations WAC 173-303, (2) the Hanford Facility RCRA Permit, and (3) correspondence between RL and Ecology on dangerous waste training.

HANFORD TRAINING COURSES

Title / course number	000001 Hanford General Employee Training
Description	Course covers DOE orders and applicable policies pertaining to employer and employee rights and responsibilities, general radiation training, hazard communications, dangerous waste, fire prevention, personal protective equipment, safety requirements, certain unit/building orientation refresher training, emergency preparedness, accident reporting, and avenues for addressing safety concerns. The RCRA training program identifies this course as a program element as an annual refresher to the Hanford Facility RCRA permit condition concerning training.
Mandating Document(s)	Hanford Facility RCRA Permit, General Condition II.C.2 and 4
Target Audience	All Hanford Facility personnel working on the Hanford Site.
Frequency	Initially and annually thereafter

Title	02006G Waste Management Awareness
Description	Course introduces workers to federal laws governing chemical safety in the work place. The course provides the hazardous material/waste worker with the basic fundamentals for safe use of hazardous materials and initial accumulation or storage of dangerous or mixed waste in containers. The concepts covered in this course instruct personnel on specific waste generation procedures and requirements which includes: (1) Applicable waste management practices (i.e., waste stream identification, waste segregation practices, completing container logsheets, and housekeeping requirements), (2) proper responses to incidents pertaining to the waste in the initial accumulation containers, (3) proper responses to questions posed in the field concerning the above elements.
Mandating Document(s)	Satellite accumulation areas: Letter: RL/US Army Corps of Engineers to Ecology "State of Washington Department of Ecology Administrative Order No. DE 94NM-063" dated April 14, 1994, items 3 and 4. Hanford Facility RCRA Permit, General Condition II.C.4
	90-day accumulation areas: WAC 173-303-330(1) Letter: RL/US Army Corps of Engineers to Ecology "State of Washington Department of Ecology Administrative Order No. DE 94NM-063" dated April 14,, 1994, items 3 and 4. Hanford Facility RCRA Permit, General Condition II.C.4
	TSD unit storage containers: WAC 173-303-330(1) Letter: RL/US Army Corps of Engineers to Ecology "State of Washington Department of Ecology Administrative Order No. DE 94NM-063" dated April 14,, 1994, items 3 and 4. Hanford Facility RCRA Permit, General Conditions II.C.1 and II.C.4
Target Audience	Hanford Facility personnel categorized as a General Worker, Advanced General Worker, and General Manager. Subcontractors categorized as General Workers. Other courses may provide equivalent training so that credit for this course is provided when the electronic data storage training record is generated.
Frequency	One-time-only
	Justification: The initial accumulation of waste can be conducted under satellite accumulation area provisions in WAC 173-303-200(2), during a project where the 90-day accumulation period starts when the waste is first placed into a container, inside an Area of Contamination during CERCLA or RCRA past practice activities, or in a TSD unit storage container. Annual refresher training is not required because unit/building specifics are adequately covered through the annual BEP and container waste management courses.

Title	020159 Advanced Course 2 - Hazardous Waste Shipper Certification
Description	Course introduces General Shippers to identify shippers' responsibilities and liabilities with regard to compliance to manifesting requirements and DOT regulations, including placarding, identifying proper shipping names, and loading requirements.
Mandating Document(s)	WAC 173-303-330(1), -180, -190, and -370. Hanford Facility RCRA Permit, General Condition II.Q as applicable.
Target Audience	General Shippers of dangerous or mixed waste on roadways anywhere on the Hanford Facility.
Frequency	Every three years.

Title	02028B Building Emergency Director Training
Description	Course provides an overview of the responsibilities of the Building Emergency Director, identifies the building emergency organizations, actions required during an event, implementing the contingency plan, and discusses drill and exercise requirements.
Mandating Document(s)	WAC 173-303-330(1), -340, -350, and -360
Target Audience	Hanford Facility personnel categorized as a General Managers because they perform the responsibilities of a RCRA Emergency Coordinator through the title of Building Emergency Director or alternate. The BED can function over TSD units or generator activities.
Frequency	Initial (Retrained annually by Building Emergency Director Requalification)

Title	035010 Waste Designation
Description	Course teaches dangerous waste designation according to WAC 173-303. Class content includes section-by-section lecture on the regulations, with examples following each section. Students complete examples using a waste designation flow chart. Examples addressed include: listed waste, characteristic waste, and Washington State criteria: toxicity and persistence.
Mandating Document(s)	WAC 173-303-330(1), -070, and -080 through -100
Target Audience	General Shippers and Waste Designators
Frequency	One-time only Justification: Another course, the Waste Designation Qualification course, annually qualifies those personnel who designate waste. General Shippers do not need to be annually retrained in this course because they can rely upon other resources within the company to help them ensure wastes are properly designated.

Title	035012 Waste Designation Qualification
Description	Course provides qualification to become a qualified waste designator.
Mandating Document(s)	WAC 173-303-330(1), -070, and -080 through -100
Target Audience	Waste Designators
Frequency	Annual

Title .	035020 Facility Waste Sampling and Analysis
Description .	Course presents waste sampling methodologies according to EPA Protocols SW-846, "Test Methods for Evaluating Solid Waste Physical/Chemical Methods." This course also covers documentation requirements in a sampling plan, waste analysis plan, field and laboratory quality control/assurance, data quality objectives process, and use of actual sampling equipment as specified by WAC 173-303-110. Finally topics on listed waste management pertaining to sample management and available on-site sampling services are covered.
Mandating Document(s)	WAC 173-303-330(1), -070, -110, and -300
Target Audience	General Shippers
Frequency	One time only Justification: In most cases on the Hanford Facility, the General Shipper will utilize resources from outside organizations to physically acquire samples. In addition, the General Shipper will also rely on the review and approval process for the development and issuance of Sampling and Analysis Plans regarding a sampling effort. This training provides an overview of information to ensure that sampling efforts are properly arranged for and planned.

Title	035100 Container Waste Management - Initial
Description	Course covers general training requirements pertaining to waste management in container at 90-day accumulation areas and TSD units. The course incorporates WAC 173-303-200(1), -630, DOE orders, and FDH policy for container management. Includes practical exercises for hands-on experience with the packaging of dangerous or mixed waste, and preparation of packages for final destination. This course does not cover waste management aspects pertaining to other RCRA waste management units such as tank systems, surface impoundments, containment buildings, landfills, etc.
Mandating Document(s)	WAC 173-303-330(1), -630, -200(1) and Waste Minimization
Target Audience	Advanced General Workers and General Managers categorized because they are immediate managers of Advanced General Workers who manage containers of dangerous or mixed waste.
Frequency	Initial only (refresher - Container Waste Management Training)

Title	035110 Container Waste Management - Refresher
Description	Refresher Course - Container Waste Management - Initial
Mandating Document	WAC 173-303-330(1), -630, -200(1), and waste minimization
Target Audience	Advanced General Workers and General Managers who are categorized because they are immediate managers of Advanced General Workers who manage dangerous or mixed waste in containers.
Frequency	Annual

Title	035120 Waste Management Administration - Initial
Description	Course is designed for personnel preparing to become shippers of dangerous and/or mixed waste. This course covers regulatory and company policies, forms, reports, forecasts, and plans. Topics also covered include: waste characterization, waste storage disposal request, low level waste storage/disposal record, transuranic waste storage/disposal record, and radioactive mixed waste attachment sheet. In addition, students will learn how these forms are used to complete shipping papers.
Mandating Document(s)	WAC 173-303-330(1), -630, -200, -210, -220, -380, and -390.
Target Audience	General Shippers.
Frequency	Initial only (Refresher - Waste Management Administration)

Title	035130 Waste Management Administration - Refresher
Description	Refreshes course - Waste Management Administration - Initial
Mandating Document(s)	WAC 173-303-330(1), -630, -200, -210, -220, -380, and -390.
Target Audience	General Shippers
Frequency	Annual

Title	037510 Building Emergency Director Requalification
Description	Refresher for Building Emergency Director Training
Mandating Document(s)	WAC 173-303-330, -340, -350, and -360
Target Audience	General Manager categorized because they can act as RCRA Emergency Coordinator in WAC 173-303-360.
Frequency	Annual .

Title	03E096 Unit/building-Specific Contingency Plan/Hazard Communication/Emergency Preparedness Training for 242-A Evaporator/LERF (Uses "Facility Emergency and Hazard Information Checklist", A-6000-784R)
Description	Course consists of a review of specific chemical hazards associated with each RCRA waste management unit and job assignment, as covered by a RCRA contingency plan. The training is completed by the supervisor, manager, or a designated individual using a checklist available on the Hanford Local Area Network under Jet Forms. The unit/building-specific information is reviewed concerning hazards in the work area and emergency response requirements, including where applicable, waste feed cut-off, communication and alarm systems, and response to fires. The training is completed by the immediate manager, or a designated individual using a checklist. The checklist acts as a guide to ensure consistent coverage of necessary topics.
Mandating Document(s)	WAC-173-303-330, -340, and -350 Letter: RL/US Army Corps of Engineers to Ecology "State of Washington Department of Ecology Administrative Order No. DE 94NM-063" dated April 14,, 1994, items 3 and 4. Hanford Facility RCRA Permit, General Condition II.C.4
Target Audience	All Hanford Facility personnel assigned to, or performing work at 242-A Evaporator/LERF. Non-Hanford personnel who will perform work unsupervised.
Frequency	Annual

Title	03E074 Unit/Building-Specific Contingency Plan/Hazard Communication/Emergency Preparedness Training for ETF/LERF (Uses "Facility Emergency and Hazard Information Checklist", A-6000-784R)
Description	Course consists of a review of specific chemical hazards associated with each RCRA waste management unit and job assignment, as covered by a RCRA contingency plan. The training is completed by the supervisor, manager, or a designated individual using a checklist available on the Hanford Local Area Network under Jet Forms. The unit/building-specific information is reviewed concerning hazards in the work area and emergency response requirements, including where applicable, waste feed cut-off, communication and alarm systems, and response to fires. The training is completed by the immediate manager, or a designated individual using a checklist. The checklist acts as a guide to ensure consistent coverage of necessary topics.
Mandating Document(s)	WAC-173-303-330, -340, and -350 Letter: RL/US Army Corps of Engineers to Ecology "State of Washington Department of Ecology Administrative Order No. DE 94NM-063" dated April 14,, 1994, items 3 and 4. Hanford Facility RCRA Permit, General Condition II.C.4
Target Audience	All Hanford Facility personnel assigned to, or performing work at ETF/LERF. Non-Hanford Facility personnel who will perform work unsupervised.
Frequency	Annual

Title	350400 242-A Evaporator Operator Certification				
Description	Qualifies NPOs to control 242-A Evaporator systems.				
Mandating Document(s) WAC-173-303-330, -640					
Target Audience	Advanced General Workers and General Managers who are categorized because they are immediate managers of Advanced General Workers who manage mixed waste in tank systems.				
Frequency	Biennial				

Title	350540 242-A Evaporator Orientation
Description	Introduction to the 242-A Evaporator, including facility mission, hazards and emergency response procedures. (Includes BEP)
Mandating Document(s)	WAC-173-303-330 Hanford Facility RCRA Permit, General Condition II.C.2
Target Audience	All Hanford Facility personnel assigned to, or doing work at, the 242-A Evaporator. Non-Hanford Facility Personnel who will perform work unsupervised.
Frequency	Annual

Title	705020 LWPF Hazardous Material/Waste Handling		
Description	Presents Waste Handlers with state, federal and Hanford specific regulations on waste handling, including: segregation, packaging, and disposal.		
Mandating Document(s) WAC-173-303-330, -630			
Target Audience	All General Workers, and Advanced General Workers and General Managers who are categorized because they are immediate managers of Advanced General Workers who manage dangerous or mixed waste in containers.		
Frequency	Annual		

Title .	705120 LWPF Outside Operator Certification
Description	Qualifies NPOs to operate those systems under the control of the LWPF Outside Operator, including: TEDF, Load-In Station, and LERF.
Mandating Document(s) WAC-173-303-330, -640, -650	
Target Audience	Advanced General Workers and General Managers who are categorized because they are immediate managers of Advanced General Workers who manage dangerous or mixed waste in tank systems and/or surface impoundments.
Frequency	Biennial

Title	705125 LWPF Primary Systems Operator Certification
Description	Qualifies NPOs to operate the ETF's Primary Treatment Train systems, including the UV/OX and the RO systems.
Mandating Document(s)	WAC-173-303-330, -640
Target Audience	Advanced General Workers and General Managers who are categorized because they are immediate managers of Advanced General Workers who manage mixed waste in tank systems.
Frequency	Biennial

Title	705130 LWPF Secondary Systems Operator Certification
Description	Qualifies NPOs to operate the ETF's Secondary Treatment Train systems, including the Secondary Waste Receiving Tanks and the ETF Evaporator and Thin Film Dryer.
Mandating Document(s)	WAC-173-303-330, -640
Target Audience	Advanced General Workers and General Managers who are categorized because they are immediate managers of Advanced General Workers who manage mixed waste in tank systems.
Frequency	Biennial

Title	705135 ETF Control Room Operator Certification
Description	Qualifies NPOs to control ETF and TEDF systems from a centralized computer system, including emergency response procedures.
Mandating Document(s) WAC-173-303-330, -340, -350, 360, -630, and -640.	
Target Audience	Advanced General Workers and General Managers who are categorized because they are immediate managers of Advanced General Workers who manage dangerous or mixed waste in containers and/or tank systems. General Managers who are Building Emergency Directors.
Frequency	Biennial

Title	705700 200 Area LEF Facility Orientation
Description	Introduction to the ETF, LERF and TEDF facilities including: facility missions, hazards, and emergency response procedures.
Mandating WAC-173-303-330 Document(s) Hanford Facility RCRA Permit, General Condition II.C.2	
Target Audience All Hanford Facility personnel assigned to, or doing work at ETF, I TEDF. Non-Hanford Facility Personnel who will perform work unsupervised.	
Frequency	Annual

Position	Job Title	Required Training
All Employee	All other Job Titles not specifically listed below.	000001, 350540 ¹ , 705700 ² , 03E096 ¹ , 03E074 ²
General Worker	Radiological Control Technician, Maintenance Personnel, including: Electrician, Instrument Technician, Insulator, Millwright, Painter, Pipefitter, Power Operator, Process Crane Operator, Rigger, Sign Painter, Truck Driver, Welder Maintenance Manager, Radiological Control Manager	000001 02006G 350540 ¹ 705700 ² 03E096 ¹ 03E074 ²
Advanced General Worker	Nuclear Process Operator	000001, 02006G, 035100, 035110, 705120 ² , 705125 ² , 705130 ² , 705135 ² , 350400 ¹ , 03E096 ¹ , 03E074 ²
General Manager	Operations Manager, Shift Operations Managers, Environmental Compliance Officer, Person-in-Charge, Hazardous Material Coordinator	000001, 02006G, 02028B, 037510, 035100, 035110, 350540 ¹ , 705700 ² , 03E096 ¹ , 03E074 ²
General Shipper	Shipper	000001, 02006G, 020159, 035010, 035020, 035100, 035110, 035120, 035130, 350540 ¹ , 705700 ² , 03E096 ¹ , 03E074 ²
Waste Designator	Waste Designator	000001, 035010, 035012, 350540 ¹ , 705700 ² , 03E096 ¹ , 03E074 ²

ATTACHMENT 2. REQUIRED LWPF TRAINING

Notes:

- These classes are specific to the 242-A Evaporator and are not required for personnel who work exclusively at LERF/ETF. TMX provides information on personnel who work exlusively at 242-A Evaporator or LERF/ETF.
- These classes are specific to the LERF/ETF and are not required for personnel who work exclusively at the 242-A Evaporator. TMX provides information on personnel who work exlusively at 242-A Evaporator or LERF/ETF.

HNF-IP-0931, 200 Area Liquid Waste Processing Facilities Administrative Policies Dangerous Waste Training Plan

ATTACHMENT 3. EXAMPLE OF TMX DATABASE REPORT

***** BUSINESS SENSITIVE *****

POSITION TRAINING REPORT

Matrix Last Modified on 07/19/97

30 Days Delinquent Forecast

*****BUSINESS SENSITIVE

Tracking Code: Manager: Organization : 200A EFFLUENT TREATMENT FAC OPS Position: Shift Ops Mgr - ETF (GM)

	Course No.	Title	Retrain Course	Individual #1	Individual #2	Individual #3	Individual #4	
	190.		Course					
м	000001	HGET	000001	09/30/97	10/10/97	01/10/98	08/26/97	
M	003034	LOCK & TAG - AUTH WRKR INITIAL	003037	11/15/97	10/29/97	11/18/97	03/10/98	
M	020001	RAD WORKER TRNG II - INIT	020003	08/06/98	11/09/97	07/11/98	09/24/98	
M	020030	SCBA ANNUAL	020030	05/09/98	10/04/97	05/22/98	06/04/98	
M	020032	SCOTT SKA-PAK AIRLINE SYSTEM	020032	05/09/98	10/04/97	05/22/98	06/04/98	•
M	020041	BASIC RESP PROTECT TRNG	020041	01/10/98	10/30/97	09/05/97	11/19/97	
M	020044	OUANTITATIVE MASK FIT	020044	01/10/98	10/30/97	09/05/97	11/19/97	
M	02006G	WASTE MANAGEMENT AWARENESS		OK	OK	OK.	OK	
M	020130	CONFND SPC ENTRY (CSE)		OK	OK	OK	OK.	
M	02028B	BLDG EMER DIR TRNG	037510	02/18/98	02/04/98	01/28/98	01/11/98	
M	020702	RAD WORKER I/II REFRESH	020702	09/30/98	10/10/98	01/09/99	08/26/98	
M	031110	24 HR RCRA TSD HAZ WASTE	032020	05/09/98	10/09/97	05/22/98	06/04/98	
M	350540	242-A EVAPORATOR ORIENT		OK	OK '	OK	OK.	
M	703036	LWPF LOCK & TAG	703036	12/31/98	12/31/98	01/09/99	12/31/98	
M	705020	200 AREA WSTE HNDLING OPS		OK	OK	OK	OK	
M	705700	200A LEF FAC ORIENT	705700	09/30/97	10/10/97	01/10/98	08/26/97	
D	000390	OJT TRAINING WORKSHOP		OK	OK	OK	OK	
D	020107	BHVR BASED SAFETY TRNG		OK	OK	OK	OK	
D	020704	RAD CON MANUAL TRNG - MGRS		OK	OK	OK	OK	
D	03E074	BLDG EMERG PLAN - 0263 - ETF	03E074	09/30/97	10/10/97	01/09/98	08/26/97	
D	03E096		03E096	03/19/98	12/19/97	03/12/98	03/12/98	
D	042720	AERIAL LIFT OPER TRNG	043920	05/17/98	11	06/15/98	04/07/00	
D	044470	FORKLIFT OPERATNL SAFETY	041890	03/18/00	//	11/29/98	11/22/99	
D	044480	MEDIUM RISK ELECT SAFETY	044480	12/12/97	04/30/00	<<08/16/97>>	09/13/97	

LEGEND

Upper case (M/D/C/P) = Course needed by all

Lower case (m/d/c/p) = Course needed by some

- = Retrain not to be maintained = Course delinquent <<
 - >> 11

= Course needed (upper case) but not taken

Date = Course retrain date

OK = Course taken; no retrain required

**** = Course taken; retrain requirement not maintained

Blank = Course not needed (lower case) and not taken

To delete specific employee retrain dates for lower case (m, d, c, p): See TMX Main Menu 5., TMX Course Alternates.

07/21/97 Position 1 16:16:46

Sheet 1 of 2

HNF-IP-0931, 200 Area Liquid Waste Processing Facilities Administrative Policies Dangerous Waste Training Plan

***** BUSINESS SENSITIVE *****	POSITION	TRAINE	IG REPORT	£ ****	BUSINESS SENS	ITIVE *****
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