



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

**Fact Sheet**

**Proposed Permit Modification to Part V of the  
*Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous  
Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of  
Dangerous Waste,*  
WA7890008967, to add Closure Unit Group 4, FS-1 Outdoor Container Storage  
Area**

August 2015

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## Fact Sheet

### **Proposed Permit Modification to Part V of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste,* WA7890008967, to add Closure Unit Group 4, FS-1 Outdoor Container Storage Area**

#### **Permittees**

United States Department of Energy  
Richland Operations Office  
PO Box 550  
Richland, Washington 99352

CH2M Hill Plateau Remediation Company  
PO Box 1600 H7-30  
Richland, Washington 99352

The Washington State Department of Ecology (Ecology) developed this Fact Sheet to fulfill the requirements of Washington Administrative Code (WAC) 173-303-840(2)(f).

The Fact Sheet provides information on Ecology's decision to modify Part V of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste* (hereafter called the Site-wide Permit). This draft permit modification adds Closure Unit Group 4, FS-1 Outdoor Container Storage Area (FS-1 OCSA) to Part V of the Site-wide Permit.

This Fact Sheet is divided into seven sections:

- 1.0 Site-wide Permit.
- 2.0 FS-1 Outdoor Container Storage Area Description.
- 3.0 The Permitting Process.
- 4.0 Procedures for Reaching a Final Decision on the Draft Permit Modification.
- 5.0 Proposed Modification to Part V of the Site-wide Permit.
- 6.0 State Environmental Policy Act (SEPA)
- 7.0 Temporary Authorization

#### **1.0 Site-wide Permit**

Ecology first issued the Site-wide Permit in 1994. The Site-wide Permit provides standard and general facility conditions, as well as unit-group conditions for the operation, closure, and post-closure care of mixed and dangerous waste management units (DWMU) at Hanford. These DWMUs are administratively grouped into operating, closure, or post-closure unit groups in the Site-wide Permit. Each unit group may contain one or more DWMU.

Conditions of the Site-wide Permit are presented in six parts:

- Part I            Standard Conditions.

Part II	General Facility Conditions.
Part III	Unit-Group Conditions for Final Status Operating Units.
Part IV	Corrective Action for Past Practice Units.
Part V	Unit-Group Conditions for Units Undergoing Closure.
Part VI	Unit-Group Conditions for Units in Post-Closure.

The Washington State Dangerous Waste Regulations in WAC 173-303-830 describe the types of changes or modifications that may be made to a Dangerous Waste Permit issued by Ecology.

This draft permit modification adds Closure Unit Group 4, FS-1 OCSA to Part V of the Site-wide Permit. The Part V, Closure Unit Group 4 draft permit modification consists of the FS-1 OCSA Closure Plan in Addendum H, and unit group permit conditions specific to closure of the FS-1 OCSA. Adding the FS-1 OCSA to Part V of the Site-wide Permit is a Class 3 permit modification.

## **2.0 FS-1 Outdoor Container Storage Area Description**

The FS-1 OCSA is located along the south side of low-level burial ground (LLBG) 218-W-5 Trench 34. It is a gravel covered, rectangular area approximately 14 meters wide by 69 meters long (46 by 226 feet), equaling a total storage area of 966 square meters (10,390 square feet). The perimeter of the FS-1 OCSA is defined by metal T-posts, with the corner posts holding signs designating the area as "FS-1." No structures or equipment are located at the storage area. (See Figures 1 and 2.)

In November 2004, the FS-1 OCSA was originally designated as a temporary waste storage area for low-level waste (LLW) containers from the 300 Area prior to disposal into LLBG Trench 34. The temporary storage of LLW ended in July 2005. From November 2007 through September 2008, the FS-1 OCSA was used for the storage of LLW, mixed low-level waste (MLLW), and *Toxic Substances Control Act of 1976*-polychlorinated biphenyl (TSCA-PCB) LLW containers prior to disposal into Trenches 31 and 34. The FS-1 OCSA is no longer storing dangerous, mixed, or TSCA-PCB waste, and will close.

The maximum inventory of MLLW and TSCA-PCB LLW stored on the FS-1 OCSA included:

- Four MLLW containers with an approximate total volume of 12 cubic meters (424 cubic feet).
- Seven TSCA-PCB LLW containers with an approximate total volume of 1.5 cubic meters (51 cubic feet).

A radiological survey was performed on the FS-1 OCSA in March 2012. The survey confirmed no radiological contamination above the expected background levels.



**Figure 1. Aerial view of FS-1 Outdoor Container Storage Area (outlined in red).  
Photo taken in November 2011.**



**Figure 2. FS-1 Outdoor Container Storage Area. Photo taken in February 2013.**

### **3.0 The Permitting Process**

In June 2013, the U.S. Environmental Protection Agency (EPA) issued a Consent Agreement and Final Order (CAFO) against the U.S. Department of Energy (USDOE) for violations of the Resource Conservation and Recovery Act of 1976 (RCRA) program at the Hanford Facility's Solid Waste Operations Complex (SWOC). The EPA CAFO was based on information collected during a 2011 inspection, and other information.

The alleged violations included:

- Storage of hazardous waste without a permit.
- Failure to meet closure plan requirements.
- Failure to submit closure notice and closure plans.
- Failure to comply with land disposal restriction requirements.

Changes to the Site-wide Permit are required by an EPA CAFO issued against USDOE. These changes are summarized as follows:

- Stop receiving waste in the DWMUs listed in the CAFO.
- Submit closure plans to Ecology within 120 days of receipt of the CAFO for the DWMUs listed in the CAFO.
- Immediately comply with all applicable final facility standards for the management of dangerous waste found in WAC 173-303-600(1) for the units listed in the CAFO.
- Submit closure plans to Ecology for the 221-T Railroad Tunnel DWMU and the 2401-W DWMU within 120 days of receipt of the CAFO, unless prior to that date Ecology approves an extension of closure per WAC 173-303-610(4)(a) or (b).
- Immediately stop the placement of prohibited dangerous waste in Trenches 31 and 34, unless the waste meets treatment standards found in WAC 173-303-140.

The FS-1 OCSA is part of the Hanford Facility's SWOC, and is included in the EPA CAFO list of DWMUs that require a closure plan. USDOE has agreed with EPA to close the FS-1 OCSA, as it was never authorized for hazardous/dangerous waste storage.

On October 11, 2013, USDOE submitted a Class 3 permit modification request to Ecology which included closure plans for the DWMUs listed in EPA CAFO. In all, 14 closure plans were submitted, including the closure plan for the FS-1 OCSA. The USDOE issued the closure plans for a 60-day public comment period that ran from October 30, 2013 to January 6, 2014, and included a public meeting held on December 9, 2013. Numerous public comments were received on the closure plans, and are addressed in the Response to Comments document that accompanies this draft permit modification. The Response to Comments document from the USDOE 60-day public comment period is also available online at <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>.

### **4.0 Procedures for Reaching a Final Decision on the Draft Permit Modification**

The Washington State Hazardous Waste Management Act (Chapter 70.105, Revised Code of Washington) and the rules declared in WAC Chapter 173-303 regulate the management of dangerous waste in Washington State. WAC 173-303-800 requires facilities that treat, store, and/or dispose of dangerous waste to obtain a permit for these activities.

This draft permit modification was prepared according to the procedures in WAC 173-303-840(2). Regulatory requirements for public notice and involvement on draft permits are described in WAC 173-303-840(3) and (4). As required by WAC 173-303-840(3)(d), draft permits will have at least a 45-day public comment period. The public comment period for this draft permit begins on August 3, 2015, and ends on September 18, 2015.

Comments must be post-marked, received by e-mail, or hand-delivered no later than close of business (5:00 p.m. PST) September 18, 2015. Direct all written comments to:

John Temple  
Washington State Department of Ecology  
3100 Port of Benton Blvd.  
Richland, Washington 99354  
E-mail address: [hanford@ecy.wa.gov](mailto:hanford@ecy.wa.gov)

In accordance with WAC 173-303-840(10)(c), when a permit is modified, only those conditions to be modified will be reopened when a new draft permit is prepared. In the case of this draft permit, only Part V, Closure Unit Group 4, FS-1 Outdoor Container Storage Area is open for public comment. All other aspects of the existing Site-wide Permit remain in effect for the duration of the draft permit modification.

Ecology will consider and respond to all written comments on this draft permit modification submitted by the deadline. Ecology will then make a final permit decision, which will become effective 30 days after Ecology provides notice of the decision to the Permittees and to all who commented. If the final decision includes substantial changes to the draft permit modification because of public comment, we will initiate a new public comment period.

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

Dieter Bohrmann  
Washington State Department of Ecology  
509-372-7950  
E-mail address: [hanford@ecy.wa.gov](mailto:hanford@ecy.wa.gov)

After completion of the 45-day public comment period, Ecology will provide a Response to Comments document and a notification of the final permit decision to the Permittees and all others who commented. The final permit decision may be appealed within 30 days after issuance of that decision.

Copies of the Part V, Closure Unit Group 4, FS-1 Outdoor Container Storage Area draft permit modification are available for review at the Hanford Public Information Repositories. For additional information, call the Hanford Cleanup Hotline toll-free at 800-321-2008 or email [hanford@ecy.wa.gov](mailto:hanford@ecy.wa.gov).

## **Hanford Public Information Repositories**

### **Richland**

United States Department of Ecology  
Nuclear Waste Program Resource Center  
3100 Port of Benton Boulevard  
Richland, Washington 99354  
Contact: Valarie Peery (509) 372-7950

United States Department of Energy  
Administrative Record  
2440 Stevens Drive  
Richland, Washington 99354  
Contact: Heather Childers (509) 376-2530

United States Department of Energy  
Reading Room  
2770 Crimson Way  
Richland, Washington 99354  
Contact: Janice Parthree (509) 375-3308

### **Portland**

Portland State University  
Branford Price Millar Library  
1875 Southwest Park Avenue  
Portland, Oregon 97207  
Contact: Claudia Weston (503) 725-4542

### **Seattle**

University of Washington Suzzallo Library  
PO Box 352900  
Seattle, Washington 98195  
Contact: Hilary Reinert (206) 543-5597

### **Spokane**

Gonzaga University  
Foley Center  
502 East Boone Avenue  
Spokane, Washington 99258  
Contact: John Spencer (509) 313-6110

This Fact Sheet and Public Notice for the proposed permit modification is also available online at <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>. If special accommodations are needed for public comment, contact Ecology's Nuclear Waste Program at 509-372-7950.

## **5.0 Proposed Modification to Part V of the Site-wide Permit**

The proposed draft permit modification adds Closure Unit Group 4, FS-1 OCSA to Part V of the Site-wide Permit. The draft permit modification consists of a unit description, a closure plan in Addendum H for closing the FS-1 OCSA, and unit group permit conditions.

### **5.1 Closure Actions**

Closure of the FS-1 OCSA will be conducted in accordance with the approved Addendum H, Closure Plan. Clean closure will be based on requirements in WAC 173-303-610(2), "Closure performance standard." Those regulations require closure of the facility in a manner that:

- Minimizes the need for further maintenance.
- Controls, minimizes, or eliminates to the extent necessary to protect human health and the environment, post-closure escape of dangerous waste, dangerous constituents, leachate, contaminated runoff, or dangerous waste decomposition products to the ground, surface water, groundwater, or the atmosphere.
- Returns the land to the appearance and use of surrounding land areas, to the degree possible, given the nature of the previous dangerous waste activity.

The FS-1 OCSA will be clean closed. The gravel and soil will be sampled and must meet regulatory required clean closure levels.

### **5.2 Basis for Closure Unit Group 4 Permit Conditions**

The unit group Permit Conditions and Addenda in Part V, Closure Unit Group 4 are intended to protect human health and the environment by ensuring the FS-1 OCSA is closed according to the approved Addendum H, Closure Plan. Ecology reviewed the closure plan submittal for the FS-1 OCSA; and has included permit conditions to ensure the Permittees comply with environmental standards, and modify the closure plan as needed during closure activities.

Permit Condition V.4.A is a standard condition that appears as the first permit condition for each unit group. It refers to the Site-wide Permit Attachment 9, Permit Applicability Matrix, which identifies which Part I and Part II Permit Conditions are applicable to DWMUs within Part III, V or VI unit groups. The permit condition also prevents conflicts between the unit group permit conditions, and the Part I and II Permit Conditions.

Permit Condition V.4.B.1 requires the Permittees to comply with all of the requirements set forth in the Addendum H, Closure Plan, and to close the FS-1 OCSA in accordance with the plan.

Permit Condition V.4.B.2 is intended to ensure sampling assumptions made in the Addendum H, Closure Plan, Attachment H-A.b, Visual Sampling Plan Supporting Documentation were met. If sampling assumptions were not met, the permit condition requires the Permittees to submit a permit modification request to amend the closure plan to include a revised sampling design.

## **6.0 State Environmental Policy Act (SEPA)**

In accordance with WAC 187-11-960, the Permittees provided a completed SEPA environmental checklist to Ecology for the FS-1 OCSA. Ecology review of the checklist, resulted in a Mitigated Determination of Nonsignificance. A copy of the Mitigated Determination of Nonsignificance is available online at

<http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>.

## **7.0 Temporary Authorization**

The Permittees have requested a temporary authorization in accordance with WAC 173-303-830(3)(e), to begin closure actions at the FS-1 OCSA. Ecology has granted this temporary authorization request for 180 days, from August 3, 2015 to January 29, 2016.