



Department of Energy

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

07-SED-0021

NOV 13 2006

Ms. Elin D. Miller, Regional Administrator
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, RA-140
Seattle, Washington 98101

Dear Ms. Miller:

RISK-BASED DISPOSAL APPROVAL (RBDA) APPLICATION FOR STORAGE OF TWO WATER TOWER TANKS ON THE HANFORD SITE

With this letter the U.S. Department of Energy is requesting a RBDA as required by 40 CFR 761.62(c) for storage of polychlorinated biphenyls (PCB) bulk product waste in a manner other than prescribed in 40 CFR 761.65. The RBDA application requests authorization to store two empty 50,000 gallon water tower tanks until a final disposal method is implemented. These tanks are coated by interior paint containing greater than 500 parts per million (ppm) PCB. These PCBs were added to the paint during manufacture and not as the result of a spill. Therefore, the paint is a PCB bulk product waste, and the tanks themselves are regulated as PCB bulk product waste.

No storage capacity complying with the requirements of 40 CFR 761.65 is available on-site. The U.S. Department of Energy, Richland Operations Office and Fluor Hanford, Inc. are currently evaluating options for compliant decontamination, disposal, and/or recycling of these tanks. Storage as requested in this RBDA application will ensure compliant storage that does not pose an unreasonable risk of injury to human health and the environment until a decontamination, disposal and/or recycling pathway can be finalized. This RBDA considers only storage for disposal and does not address disposal of the tanks.

If you have any questions, please contact me, or your staff may contact Doug S. Shoop, Assistant Manager for Safety and Engineering, on (509) 376-0108.

Sincerely,

Keith A. Klein
Manager

SED:ACM

Enclosures

cc w/encls:

D. Bartus, EPA
D. Duncan, EPA
J. E. Hyatt, FHI
M. A. Wilson, Ecology
Environmental Portal, LMSI

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Risk Based Disposal Approval (RBDA) Application

Background

This RBDA application requests authorization to store two empty 50,000 gallon water tower tanks until a final disposal method is implemented. These tanks are coated by interior paint containing greater than 500 parts per million (ppm) polychlorinated biphenyls (PCB). These PCBs were added to the paint during manufacture and not as the result of a spill. Therefore, the paint is a PCB bulk product waste, and the tanks themselves are regulated as PCB bulk product waste.

The two tanks are approximately 50,000 gallons (190,000 L) each and approximately 20 ft. high and 22 ft. in diameter (6.1 m high and 6.7 m in diameter). Tank 2901 S (Enclosure 1) was located atop a tower west of the Reduction and Oxidation (REDOX) canyon in 200 West Area and was in use during REDOX operation starting in 1952. Tank 2902 B (Enclosure 2) was located atop a tower west of B Plant canyon in 200 East Area and was in use during B Plant operation starting in 1945. Both tanks were taken down from the towers in 1997 and are currently located in the immediate vicinity of the towers. Neither tank has been exposed to radioactive materials.

The PCBs were discovered in the interior paint as the tanks were undergoing preparations to be recycled. A three-foot (1 meter) opening was cut into the side of each of the tanks on March 7, 2006. Interior paint samples were collected on March 13, 2006, and on March 21, 2006, the analytical results were returned indicating that the paint is Toxic Substances Control Act of 1976 regulated for PCBs. The analytical results were:

- Tank 2901 S, 200 West Area: 4200 ppm Aroclor 1254, and
- Tank 2902 B, 200 East Area: 5800 ppm Aroclor 1254.

All other aroclors were below detection limits, however, because of the dilution required to quantify the analytical results the detection limits for the aroclors are high (approximately 1,200 ppm). The tanks are classified as PCB bulk product waste as described and regulated under 40 CFR 761.62. Storage for disposal requirements for PCB bulk product waste of 500 ppm PCB or greater are in 40 CFR 761.65.

Planned Storage/Management Activities

Currently the tanks are in a secure location on the Hanford site. All openings in the tanks have been covered. The openings in the sides of each of the tanks have been covered with pieces of sheet metal screwed into place. The coverings are not expected to be water tight, but will keep animals and people out. Any paint chips that become loose are expected to remain in the tanks. The interior paint is in very good condition and is not expected to flake significantly. Each tank is marked with a M_L mark either affixed to the tank near the covered opening or on a post in the immediate vicinity of the tank.

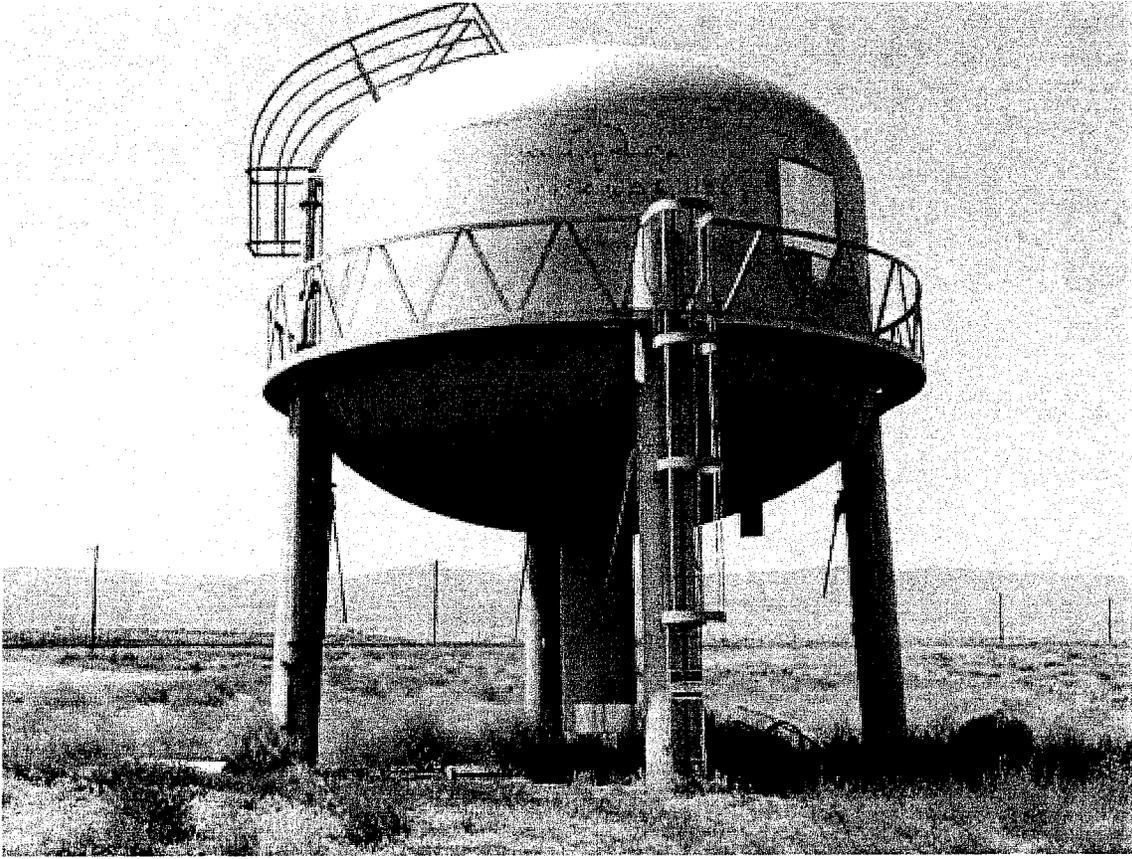
RL proposes continued storage of the tanks to allow time to determine the best course of action for future management (e.g., reuse, recycling or disposal). RL believes that the risk of injury to health and the environment from continued storage of these tanks is minimal.

The initial RBDA approval is requested for two years, with an option for two year extensions. It is anticipated that the RBDA approval will remain in effect until a final disposition method is implemented.

EPA will be informed when a final decontamination, disposal, and/or recycling pathway is identified for the tanks. Decontamination, disposal or recycling will follow self-implementing measures or a separate RBDA application will be prepared.

ENCLOSURE 1

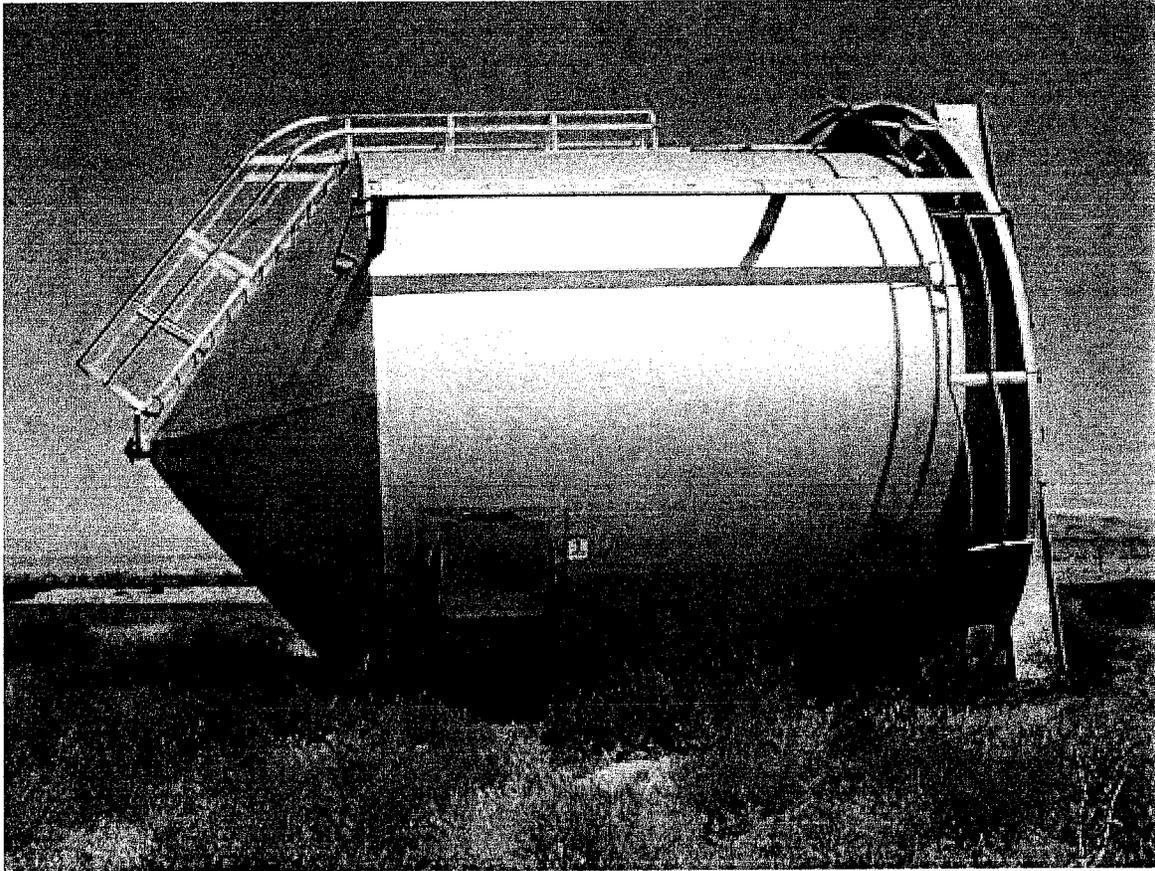
Tank 2901 S



Tank 2901 S, located in 200 West Area

ENCLOSURE 2

Tank 2902 B



Tank 2902 B, located in 200 East Area
(note: There are no gaps in the sheet metal covering the opening in the tank. The color difference is due to a change in the color of the metal surrounding the opening.)