MARTIN MARIETTA

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**ENVIRONMENTAL
RESTORATION
PROGRAM**

**Inactive Tanks Remediation Program
Strategy and Plans
for Oak Ridge National Laboratory,
Oak Ridge, Tennessee**

MANAGED BY
MARTIN MARIETTA ENERGY SYSTEMS, INC.
FOR THE UNITED STATES
DEPARTMENT OF ENERGY

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Energy Systems Environmental Restoration Program
ORNL Environmental Restoration Program

**Inactive Tanks Remediation Program
Strategy and Plans
for Oak Ridge National Laboratory,
Oak Ridge, Tennessee**

Date Issued—June 1995

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ABBREVIATIONS

ARARs	applicable or relevant and appropriate requirements
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
DOE	U. S. Department of Energy
DOE-ORO	U. S. Department of Energy Oak Ridge Operations Office
EPA	U. S. Environmental Protection Agency
ER	Environmental Restoration Program
FFA	Federal Facility Agreement
GAAT	gunite and associated tanks
HFIR	High-Flux Isotope Reactor
LLLW	liquid low-level waste
OHF	Old Hydrofracture Facility
ORNL	Oak Ridge National Laboratory
OU	operable unit
RCRA	Resource Conservation and Recovery Act
RI/FS	remedial investigation/feasibility study
ROD	record of decision
TDEC	Tennessee Department of Environment and Conservation
WAG	waste area grouping
WMRAD	Waste Management/Remedial Action Division

PREFACE

This document is being written in response to the Federal Facility Agreement (FFA) signed by the U.S. Department of Energy, the U.S. Environmental Protection Agency, and the Tennessee Department of Environment and Conservation in November 1991. The FFA was required by the Superfund Amendments and Reauthorization portion of the Comprehensive Environmental Response, Compensation, and Liability Act for all federal facilities placed on the National Priorities List. As directed by the FFA, this document presents plans and strategies for remediation of the liquid low-level waste system tanks that have been removed from service at Oak Ridge National Laboratory, Oak Ridge, Tennessee.

EXECUTIVE SUMMARY

This report presents plans and strategies for remediation of the liquid low-level waste (LLLW) system tanks that have been removed from service (also known as inactive tanks) at Oak Ridge National Laboratory (ORNL), Oak Ridge, Tennessee. These plans and strategies will be carried out by the Inactive Tank Remediation Program at ORNL.

The U. S. Department of Energy's (DOE's) Oak Ridge Reservation was placed on the National Priorities List on December 21, 1989, and a Federal Facility Agreement (FFA) was signed by DOE, the U. S. Environmental Protection Agency (EPA), and the Tennessee Department of Environment and Conservation (TDEC) in November 1991, as required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). One objective of the FFA is to ensure that LLLW tanks that are removed from service are evaluated and remediated through the CERCLA process. Tanks that have been removed from LLLW service are designated Category D in the FFA.

Since its establishment in 1943, ORNL has operated numerous facilities that generate LLLW. LLLW originates from radioactive liquid discarded into sinks and drains in research and development laboratories and from facilities such as the Radiochemical Processing Pilot Plant, nuclear reactors, radioisotope production facilities, and the Process Waste Treatment Plant.

The LLLW system is complex, with multiple facilities, users, and operators. The system is used for collection, neutralization, transfer, and concentration of aqueous radioactive waste solutions from generator facilities. Waste solutions are typically accumulated at source buildings, often in collection tanks located inside the buildings, and discharged to below-grade collection tanks that receive wastes from several different source buildings. However, in many instances, LLLW is transferred through unvalved piping directly to underground collection tanks or the central waste collection header from laboratory and hot-cell drains. A network of below-grade piping interconnects the various system components.

Most of the LLLW system was installed more than 30 years ago. The original system and its subsequent modifications were designed to minimize radiation exposure to LLLW system users and operators. The system includes features such as unvalved, gravity-drained transfer lines to prevent waste backup into generator areas; shielded lines and tanks; and provisions for remote operations to minimize personnel exposure. As-built drawings for some of the older tank systems do not exist. Over the years, tank systems were removed from service as their integrity was breached or as programs were terminated. New tank systems installed during the past 10 to 15 years incorporated secondary containment and improved leak detection features. Thus, the LLLW system is a mix of singly and doubly contained tank systems. The portions of the system that have been removed from service consist almost exclusively of tanks without secondary containment and without functioning level-indicating instrumentation.

The overall objective of the Inactive Tank Remediation Program is to remediate all LLLW tanks that have been removed from service to the extent practicable in accordance with the FFA and CERCLA requirements. Applicable or relevant and appropriate requirements (ARARs) will be addressed in choosing a remediation alternative. Preference will be given to remedies that are highly reliable and provide long-term protection. Efforts will be directed toward permanently and significantly reducing the volume, toxicity, or mobility of hazardous substances, pollutants, and contaminants associated with the

tank systems. Where indicated by operational or other restraints, interim measures short of full and complete remediation may be taken to maintain human health and ecological risks at acceptable levels until full remediation can be accomplished.

Environmental restoration requires decision making under uncertainty, and traditional approaches can sometimes be time consuming, expensive, and inefficient. Therefore, to meet the goals of the Environmental Restoration (ER) Program for inactive LLLW tanks, the remediation process for these tanks will consider (1) employing innovative and technically sound approaches to tank remedial actions; (2) balancing short-term needs to protect health and environment with long-term future use objectives for the Oak Ridge Reservation; (3) remediating the inactive tank systems in a logical order that is integrated with other remedial actions; (4) attaining cost-effective risk reduction; (5) meeting environmental regulations; and (6) addressing the expectations and requirements of all stakeholders.

The Category D tanks were preliminarily screened according to risk, remediation technology required, interferences with other equipment and piping, location, and available sludge storage. On the basis of this preliminary screening, the tanks were assigned to one of five "batches" for consideration of remedial action alternatives. A team was assembled to address remediation of the first batch of tanks, and the remaining batches were tentatively scheduled for remedial actions. This prioritization will be further refined on the basis of results from the prioritization risk assessment to be completed in early 1995.

Other tanks are scheduled to be removed from service as projects are completed to bring the active LLLW system into full FFA compliance. In anticipation of their transfer to ER, these tanks have been tentatively assigned to batches by using the same preliminary screening factors that were used for the initial batch assignment of the ER tanks. For each batch of tanks, documentation will be prepared that incorporates the requirements of the CERCLA remedial action process leading to a record of decision (ROD). A remediation alternative will be chosen on the basis of risk, as described in EPA guidance manuals. This streamlined approach will combine the CERCLA Site Investigation, Remedial Investigation, Feasibility Study, and Proposed Plan requirements into a single Interim Proposed Plan document. Following the selection of a preferred remedial action alternative and its documentation in the ROD, remedial design and remedial actions will proceed. The goal will be to arrive at final remediation for each tank system, although in some cases interim actions may be indicated.

The specific remedial action alternative for a tank system, which will reduce the risk to acceptable levels, will be described in the feasibility study section of a remediation document. Alternatives to be considered will include removing the tank and disposing of it, leaving the tank in place and isolating it from its associated piping, leaving the tank in place and filling it with a stabilizing agent, and the no action alternative.

The approach to remediation of each tank or batch of tanks must be adapted in response to the specific circumstances of individual tank sites. The approach will be tailored to accommodate feedback on lessons learned from previous remediation actions and will not be a rigid step-by-step approach that must be conducted identically for every tank system. Following successful remediation of the first batch of tanks, the plan is to proceed to increasingly complex or difficult tank or site remedial actions on the basis of knowledge and skills developed on the initial tank remedial action projects.

1. INTRODUCTION

Plans and strategies for final remediation of the liquid low-level waste (LLLW) system tanks that have been removed from service (also known as inactive tanks) are presented in this report. These tanks are designated Category D in the Federal Facility Agreement (FFA) among the U. S. Department of Energy (DOE), the U. S. Environmental Protection Agency (EPA), and the Tennessee Department of Environment and Conservation (TDEC).

The Superfund Amendments and Reauthorization Act of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) requires an FFA for federal facilities placed on the National Priorities List. The Oak Ridge Reservation was placed on that list on December 21, 1989, and the agreement was signed in November 1991 by the DOE Oak Ridge Operations Office (ORO), EPA Region IV, and the TDEC. The effective date of the FFA is January 1, 1992. One objective of the FFA is to ensure that LLLW tanks that are removed from service are evaluated and remediated through the CERCLA process.

Oak Ridge National Laboratory (ORNL) is a multidisciplinary research facility that began operation in 1943 as part of the Manhattan Project. The original mission of the laboratory was to develop a prototype graphite reactor and reprocess the reactor fuel for plutonium recovery. Subsequent to World War II, the primary functions of ORNL were fuel reprocessing research; radioisotopes production and applications development; and nuclear reactor concepts development, testing, and operation. More recently, the laboratory has increased its role in biological, environmental, energy, and materials research. As a consequence of these multidisciplinary research activities, heterogeneous wastes, including solid and liquid radioactive, hazardous, and mixed wastes, have been generated in varying amounts over time.

Since its establishment, ORNL has operated numerous facilities that generate LLLW. LLLW originates from radioactive liquid discarded into sinks and drains in research and development laboratories and from facilities such as the Radiochemical Processing Pilot Plant, nuclear reactors, radioisotope production facilities, and the Process Waste Treatment Plant.

The LLLW system is complex, with multiple facilities, users, and operators. The system is used for collection, neutralization, transfer, and concentration of aqueous radioactive waste solutions from generator facilities. Waste solutions are typically accumulated at source buildings, often in collection tanks located inside the buildings, and discharged to below-grade collection tanks that receive wastes from several different source buildings. However, in many instances, LLLW is transferred through unvalved piping directly to underground collection tanks or the central waste collection header from laboratory and hot-cell drains. A network of below-grade piping interconnects the various system components.

Most of the LLLW system was installed more than 30 years ago. The original system, installed during the early 1940s, and its subsequent modifications were designed to minimize radiation exposure to LLLW system users and operators. The system includes features such as unvalved, gravity-drained transfer lines to prevent waste backup into generator areas; shielded lines and tanks; and provisions for remote operations to minimize personnel exposure. As-built drawings for some of the older tank systems do not exist. Over the years, tank systems were removed from service as their integrity was breached or as programs were terminated. New tank systems installed during the past 10 to 15 years incorporate

secondary containment and improved leak detection features. The LLLW system is thus a mix of singly and doubly contained tank systems. The portions of the system that have been removed from service consist almost exclusively of tanks without secondary containment. Tanks that have been removed from service and tanks that are scheduled to be removed from service under the FFA, along with their locations in Bethel and Melton Valleys, are shown in Figs. 1 and 2, respectively.

This report is organized into three sections and an appendix. The objectives of the Inactive Tank Remediation Program relative to remediation of LLLW tanks that have been removed from service are presented in Sect. 2. The strategy and plans for remediating tanks that have been removed from service are detailed in Sect. 3. The appendix contains pertinent information on the individual tank systems.

Fig. 1. LLLW tanks in Bethel Valley.

2. OBJECTIVES

The objectives of the Inactive Tank Remediation Program are selected to complement the objectives for a comprehensive environmental restoration of the Oak Ridge Reservation in keeping with the mission of the Environmental Restoration Program.

ENVIRONMENTAL RESTORATION MISSION

Our mission is to remediate contaminated sites and contaminant releases to reduce current and future risk to human health and the environment. Early actions focused on reducing current or potential off site risk are conducted in parallel with efforts to select, implement, and verify final remedies for contaminated sites. Remedial efforts are prioritized and innovative approaches are developed to support cost-effective risk reduction. All efforts are conducted with an emphasis on worker health and safety and with the goals of meeting regulatory requirements and the expectations of the public.¹

As stated in Section IX of the Federal Facility Agreement,

The DOE shall remediate all tank system(s) removed from service. To the extent practicable, the DOE shall remove or decontaminate, or otherwise remediate all residues, contaminated containment system components (liners, etc.), contaminated soils and structures and equipment associated with the tank system(s).²

The overall objective of the Inactive Tank Remediation Program is to remediate all LLLW tanks that have been removed from service to the extent practicable in accordance with CERCLA requirements. In addition to risk and risk reduction, applicable or relevant and appropriate requirements (ARARs) will be addressed in choosing a remediation alternative. Preference will be given to remedies that are highly reliable and provide long-term protection. Efforts will be directed toward permanently and significantly reducing the volume, toxicity, or mobility of hazardous substances, pollutants, and contaminants associated with the tank systems. Where indicated by operational or other restraints, interim measures short of full and complete remediation may be taken to maintain human health and ecological risks at acceptable levels until full remediation can be accomplished.

Environmental restoration requires decision making with available data containing uncertainties and traditional approaches can sometimes be very time consuming, expensive, and inefficient. Therefore, to meet the goals of the ER inactive LLLW tank program, the environmental restoration process for LLLW tanks that have been removed from service will consider (1) employing innovative and technically sound approaches to tank remedial actions; (2) balancing short-term needs to protect health and environment with long-term future use objectives for the Oak Ridge Reservation; (3) remediating the inactive tank systems in a logical order that is integrated with other remedial actions; (4) attaining cost-effective risk reduction; (5) meeting environmental regulations; and (6) addressing the expectations and requirements of all stakeholders.

¹From Harry Boston's presentation to the Technical Advisory Group, fall 1993.

²FFA Section IX.G.4.

3. REMEDIATION STRATEGY

3.1 BACKGROUND

The management strategy for timely and efficient remediation of all sites at ORNL is to divide the waste units into waste area groupings (WAGs), which are areas that are either geographically contiguous or hydrologically confined units. Within each WAG, one or more operable units (OUs) have been defined. These OUs are smaller, more manageable units chosen on the basis of contaminant pathways analysis, application of similar remediation technology, geographical consideration, assessment of early or time-phased action, and remediation efficiency or simplicity considerations. The designation of all OUs for the Oak Ridge Reservation is shown in FFA Appendix C. Of interest to this report are those OUs that contain LLLW tanks.

As of December 1994, FFA Appendix F identified a total of 55 tanks that had been removed from service. The FFA designates tanks that have been removed from service as Category D. Of these 55 Category D tanks, FFA Appendix C shows that 45 are located in WAG 1, 6 are located in WAG 5, 1 is located in WAG 8, and 2 are located in WAG 9. FFA Appendix C also shows that within WAG 1 are two OUs that address tank remediation: WAG 1 OU 1, Gunite and Associated Tanks (GAAT), contains 18 tanks and the WAG 1 OU 10, Steel Tank Systems contains 28 tanks.

3.2 REMEDIATION PLAN

Of the 55 Category D tanks presently designated, 18 tanks in WAG 1 OU 1, GAAT, are being remediated under a separate project owing to the size of the tanks and complexity of their cleanup. This section describes the overall strategy to remediate the remaining 37 Category D tanks.

The 37 Category D tanks were preliminarily screened according to risk, remediation technology required, interferences with other piping and equipment, location, and available sludge removal techniques and storage requirements. On the basis of this preliminary screening, the tanks were assigned to one of 5 "batches" (I through V) for consideration of remedial action alternatives and these batches were tentatively scheduled for remedial actions. This prioritization will be further refined on the basis of results from the prioritization risk assessment and site investigation results to be available in early 1995.

The Inactive Tank Remediation Program recognizes that other tanks are scheduled to be removed from service as projects are completed to bring the active LLLW system into full FFA compliance.³ In anticipation of their transfer, the Waste Management/Remedial Action (WMRAD) active tanks have been tentatively assigned to "batches" as indicated in the Appendix. The same preliminary screening factors that were used for the initial batch assignment of the ER tanks were applied to these currently active LLLW tanks. The tanks that will be transferred from WMRAD to ER will be emptied prior to transfer and will meet acceptance criteria that are mutually acceptable to ER and WMRAD. Two additional batches are designated for these tanks. Batch VI are those tanks in the Melton Valley that serve the High-Flux Isotope Reactor (HFIR) facility. The Batch VI tanks are in close geographical proximity to one another, all receive the same waste stream, and all are scheduled to be transferred to

³Implementation Plan for Liquid Low-Level Radioactive Waste Tank Systems at ORNL Under the FFA, DOE/OR/01-1276&D2.

the ER Program at the same time. Batch VII are all the WMRAD tanks that do not fit the batch grouping criteria of the initial batches. As the program moves forward and more information becomes available, these batch VII tanks may be reassigned to other batches or they may be remediated as a separate batch or batches.

A team has been assembled to address remediation of the Batch I tanks. The team is a core group of technical representatives from the involved organizations, including ORNL Waste Management and Remedial Action Division, Energy Systems Environmental Restoration Division, Engineering, Risk Analysis, and Chemical Technology Division, Jacobs Engineering Group, Inc., and other subcontractors as appropriate. The team meets regularly to coordinate and plan remedial action activities for the tanks that have been removed from service. The team provides a mechanism for integrated responses on remedial action issues to DOE, EPA, and TDEC.

For each batch of tanks, documentation will be prepared that incorporates all the requirements of the CERCLA remediation process leading to an expedited ROD. The specific remediation alternative will be chosen on the basis of risk as described in EPA guidance manuals. This "streamlined" approach will combine the CERCLA Site Investigation, Remedial Investigation, Feasibility Study, and Proposed Plan requirements into a single Interim Proposed Plan document. The Interim Proposed Plan will clearly define the tank system components, both piping and containment (tank, vault, etc.) that will be included in the interim remedial action. The Interim Proposed Plan will also describe the means taken to safely secure the components not immediately remediated and will clearly indicate to which OUs these components will be assigned. Following the selection of a preferred remedial action alternative and its documentation in the ROD, remedial design and remedial actions will proceed. The goal will be to arrive at final remediation for each tank system, although in some cases interim actions may be indicated.

The approach to remediation of each tank or batch of tanks can and should be viewed as a dynamic, flexible, customized process that must be adapted in response to the specific circumstances of individual tank and sites. Thus, the approach will be tailored to accommodate feedback on lessons learned from previous remediation actions and will not be a rigid step-by-step approach that must be conducted identically for every tank system.

Although the specific remedial action alternatives for a tank system, which will reduce the risk to acceptable levels, will be described in the feasibility study section of an Interim Proposed Plan, four general alternatives have been identified. These four alternatives are presented in Table 1 along with the applicability, merits, and limitations of each alternative.

Tank parameters have been examined and an initial ranking made to determine the first tanks or batches of tanks to undergo remediation through the CERCLA process as required by the FFA. Remedial actions for the Batch I tanks (3001-B, 3004-B, 3013, and T-30, H-209, WC-1, W-19, and W-20) are scheduled to begin in FY 1995. All of the tanks in Batch I have previously been emptied and are thought to have no inflow.

Table 1. Anticipated alternatives for tank remedial action

Alternative	Applicability	Merits and limitations
Remove and dispose of tank and isolate piping.	Direct buried tanks and tanks within vaults.	<ul style="list-style-type: none"> • No question about remediation of tank. • No adverse impact on remediation of other OUs. • Risk reduction or other cost/benefit ratio must justify cost of removal and disposal. • Removed tank may require treatment to meet appropriate waste acceptance criteria.
Leave tank in place and isolate piping.	Direct buried tanks and tanks within vaults.	<ul style="list-style-type: none"> • To complete successful CERCLA remediation, risk posed by tank must be below EPA risk acceptability range. • Future deterioration of tank could cause recontamination. • Tank may require acceptance into remedial action of other OUs. • Tank may require continued surveillance and maintenance.
Leave tank as is.	Direct buried tanks and tanks within vaults.	<ul style="list-style-type: none"> • If tank risk falls below EPA acceptable range, the tank can be removed from CERCLA consideration. • Tank could remain under CERCLA and/or surveillance and maintenance program because of potential for inleakage and contamination.
Fill tank with stabilizing agent.	Direct buried tanks and tanks within vaults.	<ul style="list-style-type: none"> • Stabilizing agent could minimize the accumulation of liquid in the tank. • Tank must be cleaned prior to placing stabilizing agent. • Only vitrification is recognized as a RCRA BDAT. * • Remaining contaminants could be leached from stabilizing agent if tank wall is breached. • Added mass and volume of stabilizing agent would increase future excavation and waste disposal costs.

*Best demonstrated available technology

Following successful remediation of the Batch I tanks, and using the lessons learned in these projects, the plan is to proceed to increasingly more complex or difficult tank or tank site remedial actions on the basis of knowledge and skills developed on these initial tank remedial action projects.

Concurrent with remedial action planning for the Batch I tanks will be actions leading to recommendations for removal actions for the contents of the Old Hydrofracture tanks in WAG 5, the Batch II tanks. The LLLW tanks associated with WAG 5 are the five carbon steel tanks T1, T2, T3, T4, and T9 located at the Old Hydrofracture Facility (OHF) in Melton Valley and the concrete tank T-14, located at the New Hydrofracture Facility (NHF) in Melton Valley. The OHF tanks are assigned to Batch II and tank T-14 is assigned to Batch IV.

Surveillance and maintenance activities are ongoing to ensure the integrity of the OHF tanks while the sludge mobilization study and remediation plans move forward. The condition of the existing OHF LLLW transfer system is questionable and upgrading or replacement of the system or components may be necessary before waste can be removed from the tanks. The OHF tanks are good candidates for sludge mobilization and removal actions because of their geometry, sludge and supernatant inventory, and location in a remote and unpopulated WAG. The tanks themselves are probably not good candidates for in situ remediation because of their material of construction, single containment, and proximity to White Oak Creek, Melton Branch, and White Oak Lake.

Appendix A

INACTIVE LLLW TANK INFORMATION

Batch I tank systems			
Tank ID	Remediation plan	Tank type	Comments
3001-B	Combined in the first "streamlined" CERCLA document leading to proposed plan and ROD.	Vault	
3013		Buried	
T-30		Vault	
3004-B		Vault	
H-209		Buried	
WC-1		Buried	
W-19		Buried	
W-20		Buried	

Batch II tank systems (Old Hydrofracture Tanks)			
Tank ID	Remediation plan	Tank type	Comments
T1	CERCLA RI/FS process as part of the overall WAG 5 remediation strategy	Buried	
T2		Buried	
T3		Buried	
T4		Buried	
T9		Buried	

NOTE: Table acronyms are as follows.

CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
ER	Environmental Restoration Program
FFA	Federal Facility Agreement
GAAT	gunite and associated tanks
OU	operable unit
RI/FS	remedial investigation/feasibility study
ROD	record of decision
WAG	waste area grouping

Batch III tank systems (Thorium tank farm, graphite reactor facility tanks)			
Tank ID	Remediation plan	Tank type	Comments
WC-5 *	"Streamlined" CERCLA document leading to proposed plan and ROD.	Buried	
WC-6 *		Buried	
WC-8 *		Buried	
TH-1		Buried	
TH-2		Buried	
TH-3		Buried	
3002-A	"Streamlined" CERCLA document leading to proposed plan and ROD.	Vault	
3003-A		Buried	
4501-P *			
WC-7		Buried	To be transferred from active system in FY 1999
WC-9		Buried	

* Group 6 tank still owned by Waste Management.

Batch IV tank systems (Fission Products Lab, New Hydrofracture, South Tank Farm, and Isotope Circle Tanks)			
Tank ID	Remediation plan	Tank type	Comments
S-424 *	"Streamlined" CERCLA process	Vault	Tanks S-223, S-523, S-324 to be transferred from the active system in FY 1999.
S-223			
S-523			
S-324			
T-14 *	"Streamlined" CERCLA process	Buried	
W-12 (*)	"Streamlined" CERCLA process	Buried	Tank W-16 to be transferred from the active system in FY 1998.
W-16		Buried	
WC-4 *	"Streamlined" CERCLA process	Buried	
W-11 *		Buried	
LA-104		Vault	

* Group 6 tank still owned by Waste Management.

Batch V tank systems (Reactor Facility and WC-10 Tank Farm tanks)			
Tank ID	Remediation plan	Tank type	Comments
7503-A	"Streamlined" CERCLA process	Vault	
7560		Buried	
7562		Buried	
WC-11 *	"Streamlined" CERCLA process	Buried	Tank WC-10 to be transferred from the active system in FY 1998.
WC-12 *		Buried	
WC-13 *		Buried	
WC-14 * †		Buried	
WC-15		Buried	
WC-17		Buried	
WC-10		Buried	

Batch VI tank systems (Melton Valley tanks to be transferred from active system)			
Tank ID	Remediation plan	Tank type	Comments
WC-20	"Streamlined" CERCLA process	Vault	This group of tanks is scheduled to be transferred to the ER program in FY 1997.
HFIR		Buried	
T1		Buried	
T2		Buried	

* Group 6 tank still owned by Waste Management.

† Tank WC-14 will undergo a removal action to remove the liquid contents before final remediation.

Batch VII tank systems (Scheduled to be transferred from active system, but not fitting in other batches)				
Tank ID	Remediation plan	Tank type	Transfer date (FY)	Comments
2026-A	"Streamlined" CERCLA process	Vault	1995	
WC-2		Buried	1996	
WC-3		Buried	1999	
WC-19		Buried	1996	
F-201		Vault	1998	
F-501		Vault	1998	
L-11		Inside Bldg. 3544	2001	

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