



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 2, 2010

Mr. Douglas Chapin
NEPA Document Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN A5-11
Richland, Washington 99352

RECEIVED
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EDMC

Re: Department of Ecology (Ecology) Review of Environmental Assessment (EA): Closure of Nonradioactive Dangerous Waste Landfill (NRDWL) and Solid Waste Landfill (SWL), Hanford Site, Richland, Washington, DOE/EA-1707D, dated May 2010

Dear Mr. Chapin:

Ecology reviewed the EA referenced above. We find that the document has several deficiencies. Ecology cannot use this EA to conduct the environmental review that the State Environmental Policy Act (SEPA) Rules [Washington Administrative Code (WAC) Chapter 197-11-330] require to incorporate this closure group into the Hanford Dangerous Waste permit. This EA does not provide complete or accurate information that would suffice in lieu of a SEPA checklist (WAC 197-11-610(2)).

The following list is a summary of Ecology's major concerns with the draft EA. We request that you address each as you prepare a revision to the EA. By July 8, 2010, we will transmit more detailed comments electronically which should merit careful consideration as you revise this document.

1. Ecology expects the United States Department of Energy (USDOE) to revise the EA waste inventory to reflect actual waste inventory records that are available for both the NRDWL and SWL units. This EA relies on the waste inventory that appears in the *Draft Tank Closure and Waste Management Environmental Impact Statement* (DTC&WM EIS) as its primary source.
2. The revision to the EA should evaluate the impacts of the closure of the NRDWL and the SWL on its own merits. This EA deferred to the analyses of cumulative impacts, risk, and mitigation that appear in the DTC&WM EIS. As the DTC&WM EIS is still in draft form, Ecology considers its conclusions to be preliminary.

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3. The USDOE must revise the EA to include the form and quantities of past releases in the vadose zone and groundwater from the NRDWL and the SWL and any past abatement measures that were taken. This EA does not enumerate or discuss those past releases.
4. Please provide a discussion of the additional potential sources of barrier materials, apart from Borrow Area C or Pit 6.
5. The EA should provide a defensible approach that shows that leaving waste in place is environmentally protective and does not cause significant adverse impacts. The EA does not provide any information about the environmental benefits for leaving waste in place beneath an evapotranspiration (ET) barrier in comparison to performing partial or total removal, treatment, and disposal (RTD).
6. The EA should provide a detailed analysis that shows that the ET barrier that will form the cover will perform in a manner equivalent to the conventional Resource Conservation and Recovery Act Subtitle C cover.
7. The EA should provide detailed information about the threat to human health and the environment from the migration of contaminants because of continued infiltration of precipitation into the waste.

We urge you to arrange for prompt revision of the EA to support closure of NRDWL and SWL. Please call Deborah Singleton at 509-372-7923 to discuss these comments.

Sincerely,



Ron Skinnarland
Waste Management Section Manager
Nuclear Waste Program

js

cc:

Kevin Leary, USDOE
Stuart Harris, CTUIR
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