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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 17, 2013

13-NWP-051

Mr. Matthew S. McCormick
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A7-50
Richland, Washington 99352

Re: Approval of 13-EMD-0019, Class 2 Modification to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part VI, Post-Closure Unit 2, 183-H Solar Evaporation Unit (T-1-4) WA7890008967 1219400*

Dear Mr. McCormick:

The Department of Ecology approves the referenced Class 2 Modification upon receipt of a signed letter containing the appropriate certification statement in accordance with WAC 173-303-810(12) and WAC 173-303-810(13). Please submit with the letter, a hard copy of the changes and the associated modification notification forms for our records.

This modification removes all references to Well 199-H4-3 for the replacement Well 199-H4-84. The temporary authorization for this permit modification was granted on March 18, 2013.

This Class 2 permit modification replaces portions of Section 3.0 of the Groundwater Monitoring Plan for corresponding permit pages in Part VI, Unit 2, Section 3.0 of the 183-H Solar Evaporation Unit (T-1-4). Please replace these pages, accordingly.

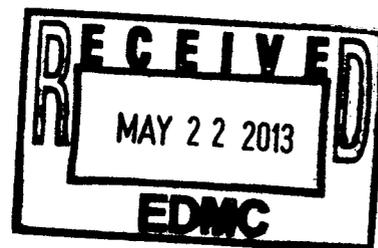
If there are any questions, please contact Dwayne Crumpler, Hydrogeologist, at (509) 372-7925 or dcr461@ecy.wa.gov.

Sincerely,

Nina Menard
Environmental Restoration Project Manager
Nuclear Waste Program

dc/tkb
Enclosures (2)

cc: See page 2



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Mr. Matthew S. McCormick
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cc electronic w/enc:

Dennis Faulk, EPA
Briant Charboneau, USDOE
Ellwood Glossbrenner, USDOE
James P. Hanson, USDOE
Tony McKarns, USDOE
John Neath, USDOE
Roberta Day, CHPRC
Bonnie Howard, CHPRC
Kristine Ivarson, CHPRC
Donna Yasek, WCH
Ken Niles, ODOE
Dwayne Crumpler, Ecology
USDOE-ORP Correspondence Control

cc w/enc:

Steve Hudson, HAB
Administrative Record: Environmental Restoration (TSD #T-1-4) ✓
Environmental Portal

cc w/o enc:

John Cox, CTUIR
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN



Comments Responses for 183-H Class 2 Modification

1. More information on the operation of the new HX pump and treat system (including wells) would be helpful in understanding the integration of the CERCLA and RCRA monitoring networks.

RESPONSE: Thank you for your comment; however, this comment is out of scope for this Class 2 Permit Modification. This permit modification only addresses well 199-H4-3 and its replacement well 199-H4-3.

2. Information presented in Modification forms are inconsistent with information presented in tables within the same modification sheets. (see Table 0.1 pg. 6 of 7; table 0.2 pg. 7 of 7)

RESPONSE: Thank you for your comment, the modification forms were changed so that well H4-3 was marked as a strikeout and well H4-84 was shown as an addition to Table 3.1 (Table 0.1 on modification form) and Table 3.3 (Table 0.2 on the modification form).

3. RCRA monitoring network well list: Edit to include following:
 - Wells # 199-H4-5 and 15 A, B, C.

RESPONSE: Thank you for your comment; however, this comment is out of scope for this Class 2 Permit Modification. This permit modification only addresses well 199-H4-3 and its replacement well 199-H4-3.

4. Using Table 3.2, edit Table 3.1 as follows:
 - For all RCRA wells listed under Compliance and Corrective Action, change Sampling and Analysis Schedule to sampling codes M-2, 3. Request schedule change for 2 years. Need enough data to support effectiveness of corrective actions and groundwater flow assumptions. Semi-annually is not defensible given recent discovery of exceedances of Permit (see DOE letter 12-AMRP-0123 noting exceedances of nitrate and uranium).

RESPONSE: Thank you for your comment; however, this comment is out of scope for this Class 2 Permit Modification. This permit modification only addresses well 199-H4-3 and its replacement well 199-H4-3.

5. Using Table 3.2, edit Table 3.1 as follows:
 - For all wells listed under CERCLA Remediation which are also RCRA wells, change Sampling and Analysis Schedule to sampling codes M-2, 3. Request schedule change for 2 years. Need enough data to support effectiveness of corrective actions and groundwater flow assumptions. Semi-annually is not defensible given recent discovery of exceedances of Permit (same comment previously noted by Ecology regarding defensibility given recent discovery of exceedances of Permit).

RESPONSE: Thank you for your comment; however, this comment is out of scope for this Class 2 Permit Modification. This permit modification only addresses well 199-H4-3 and its replacement well 199-H4-3.

6. Analysis/Parameters: Filtered and unfiltered samples to be done for all metal analyses, except RDM collects only filtered samples. Request explanation of use of filter sampling when regulations cite unfiltered.

RESPONSE: Thank you for your comment; however, this comment is out of scope for this Class 2 Permit Modification. This permit modification only addresses well 199-H4-3 and its replacement well 199-H4-3.

7. Other Analysis/Parameters: Metals Other: Laboratory Specific Uranium Method; Chromium, hexavalent: Using total chrome and subtracting is somewhat unreliable. Request specific evaluation of hexavalent chromium is performed.

RESPONSE: Thank you for your comment; however, this comment is out of scope for this Class 2 Permit Modification. This permit modification only addresses well 199-H4-3 and its replacement well 199-H4-3.

8. What treatment system is reducing the Sr-90 concentrations in H Area; it's not captured by the ion exchange system? Request clarification and inclusion of treatment system for Sr-90.

RESPONSE: Thank you for your comment; however, this comment is out of scope for this Class 2 Permit Modification. This permit modification only addresses well 199-H4-3 and its replacement well 199-H4-3.

9. Provide rationale for not discontinuing use of dilution factor of 1:1 to demonstrate compliance with WAC AWQS for chromium of 11ug/L in riverbed sediments or 22ug/L at compliance points.

RESPONSE: Thank you for your comment; however, this comment is out of scope for this Class 2 Permit Modification. This permit modification only addresses well 199-H4-3 and its replacement well 199-H4-3.

10. RL's Temporary Authorization request: Supporting information provided does not fully meet the compliance requirements of WAC 173-303-645(8). Request re-evaluation of points of compliance, stated as wells H4-4,-4-5,-4-49,-4-63,-4-64 (some Concerns: Ex. Unclear how background water quality is determined. Flow is more northerly than east with pump and treat system actions.)

RESPONSE: Thank you for your comment; however, this comment is out of scope for this Class 2 Permit Modification. This permit modification only addresses well 199-H4-3 and its replacement well 199-H4-3. The Temporary Authorization request to decommission well 199-H4-3 was granted by Ecology on March 18, 2013 as a result of the ongoing soil remediation under the CERCLA cleanup.

11. Unidentified figure page 21. Clarify.

RESPONSE: Thank you for your comment. This is a color figure that shows the two wells in this Class 2 Permit modification. Unfortunately, it does not communicate this information very well in black and white.

Comments Responses for 183-H Class 2 Modification

I think that no! It will not effect the Columbia Basin wildlife and fisheries, so long as an additional well is monitoring any possible leakage from the waste site.

RESPONSE: Thank you for your comment. A replacement well, 199-H4-84, was installed to monitor for any possible leakage from the waste site.