

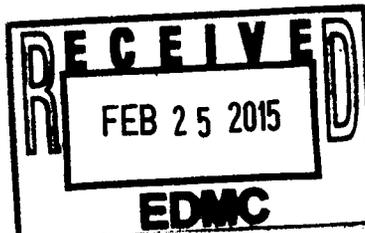


STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 23, 2015

15-NWP-037



Mr. Ryan Beach, General Engineer
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Department of Ecology's (Ecology) Review of RPP-RPT-58339, *Phase 2 RCRA Facility Investigation Report for Waste Management Area C*, Rev. A Draft

References: See page 2

Dear Mr. Beach:

Ecology received RPP-RPT-58339, Rev. A Draft, submitted with Letter 14-TF-0131, dated December 23, 2014, to fulfill Milestone M-045-61.

Ecology will require an extension for the submittal of our comments until July 1, 2015. We will provide review comment record comments along with subject areas that require further information and definition for the final Waste Management Area C (WMA C) Resource Conservation and Recovery Act Facility Investigation (RFI).

We will also provide comments, as necessary, on associated reference documents provided with the WMA C RFI, such as the *Baseline Risk Assessment for Waste Management Area C* (RPP-RPT-58329, Rev. 0, December 2014).

One of Ecology's concerns is the extent and sources of the groundwater contamination found within WMA C. Ecology has consistently emphasized the importance of understanding the volume, magnitude, and extent of vertical and horizontal groundwater contamination. The statement in RPP-RPT-58339, Rev. A, Section 1.1.3 lines 39-41, "Groundwater characterization information presented in this Phase 2 RFI report is included solely for the purposes of defining the nature and extent of soil contamination for use in subsequently evaluating soil corrective actions" is insufficient to meet closure and corrective action requirements.

Milestone M-045-61A, due December 31, 2016, requires the submittal of both the Revision 0 of WMA C RFI and a Phase 2 Corrective Measures Study (CMS), as primary documents.

The WMA C RFI will form the basis for corrective measures selection and analysis in the CMS. Additionally, Appendix I of the Tri-Party Agreement identifies the need for appropriate groundwater information to support the submittal of a closure plan for WMA C (WAC 173-303-610(3)).



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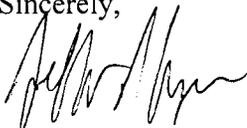
The necessary groundwater information is available and it is essential that USDOE-ORP include enough groundwater information in the WMA C RFI to support development of a closure plan. If the information is not provided or is incomplete the document will not meet the minimum requirements of an RFI/CMS.

A second concern is in regards to your reference from Letter 10-TPD-088, dated August 18, 2010, RPP-PLAN-37243, Revision 2 (Reference 2). Ecology agrees that this is a necessary document for reference, however, Ecology indicated that a revision is necessary as documented in Reference 3.

It would be beneficial if USDOE-ORP and Ecology could discuss the needed revisions and resolve any concerns prior to work on the first revision of the WMA C RFI Report. Ecology recommends USDOE-ORP schedule a recurring meeting to discuss statements, regulatory interpretations, and the process steps for obtaining an agreeable RFI/CMS process for WMA C Closure.

If you have any questions, please contact me at jeff.lyon@ecy.wa.gov or 509-372-7914.

Sincerely,



Jeff Lyon
Tank Systems Operations and Closure Project Manager
Nuclear Waste Program

mb/aa

- Reference 1: Letter 14-TF-0131, dated December 23, 2014, from K. W. Smith, United States Department of Energy-Office of River Protection (USDOE-ORP), to J. A. Hedges, Ecology, "The U.S. Department of Energy, Office of River Protection Submittal of the Draft Resource Conservation and Recovery Act Facility Investigation Report for Waste Management Area C in Completion of Milestone M-45-61"
- Reference 2: Letter 10-TPD-088, dated August 18, 2010, from S. Charboneau, USDOE-ORP, to J. Lyon, Ecology, "Submittal of the Phase 2 Resource Conservation and Recovery Act (RCRA) Facility Investigation/Corrective Measures Study Master Work Plan for Single-Shell Tank (SST) Waste Management Areas (WMA), RPP-PLAN-37243, Revision 2 (Phase 2 Master Work Plan)"
- Reference 3: Dated June 2, 2010, from J. Lyon, Ecology, to R. Lober, USDOE-ORP, "USDOE Response to Ecology Comments Phase 2 Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI/Corrective Measure Study (CMS) Master Work Plan for Single-Shell Tank (SST) Waste Management Areas, RPP-Plan-37243, Revision 2 (Phase 2 Master Work Plan)"

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cc electronic:

Dennis Faulk, EPA
Rebecca Gerhart, EPA
Christopher Kemp, USDOE
Jon Perry, MSA
Marcel Bergeron, WRPS
Susan Eberlein, WRPS
Ken Niles, ODOE
Michael Barnes, Ecology
Joe Caggiano, Ecology
Damon Delistraty, Ecology
Beth Rochette, Ecology
Cheryl Whalen, Ecology
USDOE-ORP Correspondence Control
Environmental Portal
Hanford Facility Operating Record

cc: Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Steve Hudson, HAB
Administrative Record
NWP Central Files
NWP Reader Files