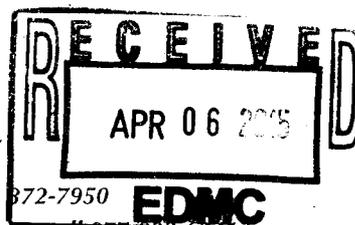




STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 1, 2015

15-NWP-065

By certified mail

Ms. Stacy Charboneau, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A7-50
Richland, Washington 99352

Mr. John A. Ciucci, President and CEO
CH2M HILL Plateau Remediation Company
PO Box 1600, MSIN: H7-30
Richland, Washington 99352

Re: United States Department of Energy (USDOE) Letter 15-AMRP-0065, Received February 3, 2015, "Transmittal of the Draft A, Revision 4, Versions of the Surveillance and Maintenance Plans for the Plutonium-Uranium Extraction Facility, the 202-S Reduction Oxidation Facility, and the 221-B Facility," RCRA Site ID: WA7890008967, NWP Compliance Index No.: 15.515

Reference: Tri-Party Agreement Change Number M-20-96-01, Dated October 18, 1996, "Revise Interim Milestone M-20-21A Due to B Plant Facility Transition"

Dear Ms. Charboneau and Mr. Ciucci:

The Department of Ecology's (Ecology) Dangerous Waste Compliance has reviewed the Draft A Revision 4 Surveillance and Maintenance (S&M) Plans.

The pre-closure work plans for the PUREX Facility (DOE/RL-95-78, Rev. 1) and B Plant Complex (DOE/RL-98-12, Rev. 1) are identified as Tri-Party Agreement (TPA) Primary Documents (Reference). Currently, the Surveillance and Maintenance (S&M) Plans are an attachment to these pre-closure work plans.

As primary documents, pre-closure work plans are subject to the requirements of TPA Action Plan Section 9.3, which states,

"Following finalization of a document, the lead regulatory agency, or the DOE may seek to modify the document."

The enforceable dangerous waste requirements (Washington Administrative Code [WAC] 173-303) must be addressed in the pre-closure work plans. Because of this, Ecology requests that USDOE re-submit the pre-closure work plans for the PUREX Facility and B Plant Complex to include updated Revision 4 S&M Plans as attachments. Ecology requests, at a minimum, USDOE include the following in the pre-closure work plans for the PUREX Facility and B Plant Complex:

1. Reference to the Air Operating Permit, Radioactive Air Emission License as the applicable air quality requirements for the PUREX Facility and B Plant Complex.
2. Reference the applicable interim status standards (WAC 173-303-400) and other applicable Dangerous Waste Regulations (WAC 173-303-280 through -395) for each Dangerous Waste Management Unit. Include any identified dangerous waste regulation discrepancies and the compliant equivalent.

TS-24, S-21, M-20-21A, 0057479, 0047401, 0051813

Ms. Charboneau and Mr. Ciucci
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 PUREX Facility and B Plant Complex
 RCRA Site ID: WA7890008967
 NWP Compliance Index No.: 15.515
 Review Date: February 3, 2015

3. Reference the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) endpoints (i.e., the pending Remedial Investigation/Feasibility Study [RI/FS] work plans).
4. Provide schedules for each Dangerous Waste Management Unit closure, including the schedule for CERCLA RI/FS work plans.

If you have questions or need further information, please contact me at (509) 372-7909 or edward.holbrook@ecy.wa.gov, or John Temple at (509) 732-7940 or john.temple@ecy.wa.gov.

Sincerely,



Edward Holbrook
 Dangerous Waste Compliance Inspector
 Nuclear Waste Program

tkb

cc electronic:

Dennis Faulk, EPA
 Dave Bartus, EPA
 Jack Boller, EPA
 Wade Woolery, USDOE
 Al Farabee, USDOE
 Brian Dixon, CHPRC
 Jon Perry, MSA
 Ken Niles, ODOE
 John Martell, WDOH
 Crystal Mathey, WDOH
 Debra Alexander, Ecology
 Kelly Elsethagen, Ecology
 Jane Hedges, Ecology
 Edward Holbrook, Ecology
 John Price, Ecology
 Ron Skinnarland, Ecology
 John Temple, Ecology
 Environmental Portal
 Hanford Facility Operating Record

cc:

Stuart Harris, CTUIR
 Gabriel Bohnee, NPT
 Russell Jim, YN
 Steve Hudson, HAB
 Administrative Record: PUREX Facility
 and B Plant Complex
 CHPRC Correspondence Control
 NWP Central File
 NWP Compliance Index File: 15.515
 NWP Reader File