



Oregon

Theodore R. Kulongoski, Governor



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Rick Bond
Washington Department Of Ecology
3100 Port of Benton Blvd
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**Subject: Comments on the Hanford Facility Dangerous Waste Closure Plan, 241-Z
Treatment and Storage Tanks**

Dear Ms. Charboneau and Mr. Bond,

Thank you for the opportunity to review the 241-Z Closure Plan. We have the following concerns and comments.

In general, the plan makes many assumptions concerning conditions in the 241-Z area. Some of these assumptions appear unwarranted and unsupported. Specific examples are included in the comments below.

- Page 6-2, Line 34; Closure Standards for Underlying Soil states that the concrete of the tank vaults will be inspected and if it is intact, the underlying soil will be assumed to be uncontaminated. We disagree. Concrete is a porous material and it is possible for contaminants to diffuse through the concrete into the soil. In addition, the sumps in each vault are below floor level and there is no specific mention anywhere in this document of examining them for potential leakage. We recommend that as a minimum, the concrete be sampled to determine if it is contaminated, and sumps be examined in detail for contamination and potential leakage. If the concrete or the sumps is found to be contaminated, the soil under the vaults should be sampled to verify its condition.
- Page 7-4, line 26; an assumption is made about the preparations made in the past to paint the tank, and from there the tank is assumed to be uncontaminated. There is no objective evidence for the validity of these assumptions. We recommend that the surface of the tank be sampled to determine its actual contamination status.

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- Page 7-5, line 42, assumes no void spaces will be discovered when the bases of the tanks are examined. There is no contingency plan discussed in the event that void spaces are discovered during these examinations. We recommend that this eventuality be discussed and planned for in this document.
- Page 7-6, line 6; the assumption is made that if no cracks exist at the edge of the tank support pad, there are no cracks in the interior of the support pad. This is inconsistent with the previous implicit assumption concerning the integrity of the concrete vaults where it was assumed that cracks would not necessarily propagate through the entire thickness of the concrete (see earlier comment). We recommend that the interior of the support pad be examined, possibly by ultrasonic methods, to verify the integrity of this structure.

Should you have any questions, please contact Mr. Douglas Huston of my staff at (503) 378-4456.

Sincerely,



Ken Niles
Assistant Director

Cc: Barbara Jarvis – Chair, Oregon Hanford Cleanup Board
Armand Minthorn – Confederated Tribes of the Umatilla Indian Reservation
Russell Jim – Yakama Nation
Patrick Sobotta – Nez Perce Tribe
Todd Martin – Chair, Hanford Advisory Board
Nicholas Ceto – U.S. Environmental Protection Agency