

RECEIVED

DEC 05 2019

EDMC



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

December 3, 2019

19-NWP-193

Brian A. Harkins, Deputy Assistant Manager, Tank Farms  
Office of River Protection  
United States Department of Energy  
PO Box 450, MSIN: H6-60  
Richland, Washington 99352

Re: RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) Work Plan for Waste Management Area (WMA) A/AX, Milestone M-045-98

References: See page 2

Dear Brian A. Harkins:

In our November 21 meeting, United States Department of Energy (USDOE) indicated willingness to conduct workshops to support the *Hanford Federal Facility Agreement and Consent Order* (HFFACO) Milestone M-045-98 (due September 30, 2022), "Submit to Ecology as a Primary Document, a RFI/CMS work plan for WMA A/AX, including an implementation schedule in accordance with HFFACO Action Plan Section 11.6." The work plan will incorporate information obtained through the Data Quality Objective (DQO) process for WMA A/AX soil investigation through actual field characterization and any necessary interpretation of existing data.

The Department of Ecology (Ecology) appreciates the willingness of USDOE to conduct these DQO workshops and to invite stakeholders, representatives from Oregon, and the tribal governments.

Following completion of the DQO and Sampling and Analysis Plan, Ecology would like to work with USDOE in developing a RFI/CMS Work Plan for WMA A/AX (Milestone M-045-98) to ensure an efficient review and approval of this document.

USDOE has initiated field investigations to characterize WMA A/AX in Focus Area 1 (Reference 1). This fiscal year we anticipate that USDOE will complete WMA A/AX Focus Area 2 field work.

Ecology has concerns to be considered with the development of the Conceptual Site Model (CSM) for the WMA A/AX RFI/CMS:

- In 1958, groundwater contamination was found in A-farm wells before the farm received any waste.
- Groundwater well corrosion investigation of WMA A wells E24-19 and E25-46 found technetium 99 on the well casings immediately above the existing groundwater levels about 275 feet below ground surface (Reference 2).
- Contamination is detected in the WMA A/AX well network, and only a portion of this contamination is believed to have originated from WMA A/AX.

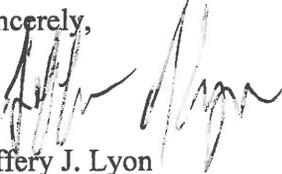


Development of an accurate CSM for the farm and a summary of the current understanding of history and current conditions at the farm is important as a starting point in the DQO and the RFI/CMS process. Given the scope of the RFI/CMS investigation, resolution of these concerns is important and will present challenges to create an accurate CSM.

We acknowledge that field work in WMA A/AX may be impacted by the tank retrieval schedule, and that these impacts may be of long duration. Because of the retrieval activities, the RFI/CMS work plan needs to consider these activities for developing the implementation schedule for this investigation.

If you have any questions, please contact me at [jeff.lyon@ecy.wa.gov](mailto:jeff.lyon@ecy.wa.gov) or at (509) 372-7914.

Sincerely,



Jeffery J. Lyon  
Tank Systems Operation and Closure Project Manager  
Nuclear Waste Program

aa

References:

1. Letter 19-TPD-0006 REISSUE, dated May 30, 2019, "Reissue - The U.S. Department of Energy, Office of River Protection Transmittal of Data Quality Objectives for Vadose Zone Characterization at Waste Management Area A-AX, RPP-RPT-60227, Revision 1."
2. Document PNNL-15141, date August 2005, "Investigation of Accelerated Casing Corrosion in Two Wells at Waste Management Area A-AX"

cc electronic:

Dave Einan, EPA  
Robert Hastings, USDOE-ORP  
Cindy Tabor, WRPS  
Paul Rutland, WRPS  
Jon Perry, MSA  
ERWM Staff, YN  
Ken Niles, ODOE  
Mike Barnes, Ecology  
Jeff Lyon, Ecology

Nina Menard, Ecology  
Environmental Portal  
Hanford Facility Operating Record  
MSA Correspondence Control  
USDOE-ORP Correspondence Control  
USEPA Region 10 Hanford Field Office  
Correspondence Control  
WRPS correspondence Control

cc: Mason Murphy, CTUIR  
Jack Bell, NPT  
Rex Buck, Jr., Wanapum  
Laurene Contreras, YN  
Susan Leckband, HAB

Hanford Administrative Record  
NWP Central File