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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 4, 2017

17-NWP-137

Mr. Benton J. Harp, Acting Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN H6-60
Richland, Washington 99352

Mr. Mark A. Lindholm
President and Project Manager
Washington River Protection Solutions
PO Box 850, MSIN H3-21
Richland, Washington 99352

Re: Ecology Response to Washington River Protection Solutions LLC Submittal of State Waste Discharge Permit Number ST0004500 Groundwater Monitoring Tritium-Tracking Plan for the State-Approved Land Disposal Site

Reference: See page 2

Dear Mr. Harp and Mr. Lindholm:

Permit condition S10 of State Waste Discharge Permit ST0004500 requires the Effluent Treatment Facility/State Approved Land Disposal Site to maintain and implement a Tritium Tracking and Groundwater Monitoring Plan (Plan). This condition also states that the Washington State Department of Ecology (Ecology) is to approve any proposed revisions or modifications to the Plan prior to implementation.

On March 31, 2016, Ecology received a request to modify the Plan (reference). The two proposed changes to the Plan were to:

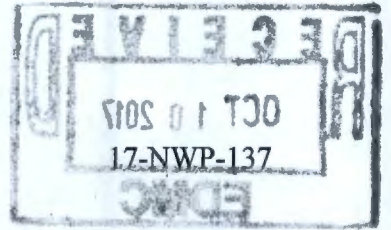
- Change the document number from PNNL-13121 to RPP-ENV-59215; the document title would remain the same.
- Delete all existing text within Section 5.3, including all associated subsections, and replace with the following statement:

"The sampling and analysis plan (SAP) previously contained within Section 5.3 has been removed and replaced by a stand-alone SAP. For the latest revision of the applicable SAP, see the current version of RPP-PLAN-60544, Sampling and Analysis Plan for the 200 Area State-Approved Land Disposal Site."

At this time, the Permittees have not submitted a complete modification to the Plan to incorporate both proposed changes as listed above. Therefore, Ecology will not approve the modifications until the above changes to the Plan are made and submitted to Ecology for review and approval through the modification process.



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The permittees should continue to follow the existing Plan requirements (PNNL-13121), as required under permit condition S10 of State Waste Discharge Permit ST0004500. Ecology would be happy to continue discussions on this modification, once the complete modification is submitted.

Please contact, Katie Hall, Permit Writer, at (509) 372-7885 or kawi461@ecy.wa.gov, or Stephanie Schleif, Project Manager, at (509) 372-7929 or ssch461@ecy.wa.gov with any questions or concerns.

Sincerely,

Ron Skinnarland
Waste Management Section Manager
Nuclear Waste Program

Reference: Letter WRPS-1601151, dated March 30, 2016, "Washington River Protection Solutions LLC Submittal of State Waste Discharge Permit Number ST0004500 Groundwater Monitoring Tritium-Tracking Plan for the State-Approved Land Disposal Site"

cc: electronic

- Laura Buelow, EPA
- R. L. Evans, USDOE
- D. R. Garcia, USDOE
- W. E. Hader, USDOE
- R. G. Hastings, USDOE
- M. J. Harrison, USDOE
- C.J. Kemp, USDOE
- E. M. Mattlin, USDOE
- M. T. McCusker, USDOE
- S. C. Persons, USDOE
- S. D. Stubblebine, USDOE
- G. D. Trenchard, USDOE
- R. J. Valle, USDOE
- C. P. Allen, WRPS
- A. D. Basche, WRPS
- M. W. Bowman, WRPS
- S. B. Cherry, WRPS
- K. A. Downing, WRPS
- T. L. Farber, WRPS
- J. L. Foster, WRPS
- J. T. Hamilton, WRPS
- J. A. Joyner, WRPS
- R. D. Teel, WRPS

cc: electronic

- Jon Perry, MSA
- Rose Ferri, YN
- Ken Niles, ODOE
- Katie Hall, Ecology
- Stephanie Schleif, Ecology
- MSA Correspondence Control
- USDOE-ORP Correspondence Control
- WRPS Correspondence Control
- Environmental Portal

cc:

- Matt Johnson, CTUIR
- Jack Bell, NPT
- Rose Longoria, YN
- Susan Leckband, HAB
- Administrative Record**
- NWP Central File