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Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

13-AMRP-0001

OCT 25 2012

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Nuclear Waste Program  
State of Washington  
Department of Ecology  
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Richland, Washington 99354

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Hanford Project Office  
U.S. Environmental Protection Agency  
309 Bradley Boulevard, Suite 115  
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Addressees:

CALENDAR YEAR 2011 HANFORD SITE MIXED WASTE LAND DISPOSAL  
RESTRICTIONS SUMMARY REPORT, DOE/RL-2012-12, REVISION 0

This letter responds to the August 17, 2012, (12-NWP-140) State of Washington Department of Ecology's comments on the Calendar Year 2011 Hanford Site Mixed Waste Land Disposal Restrictions Summary Report, DOE/RL-2012-12, Revision 0. Attached are the U.S. Department of Energy Richland Operations Office's (RL) responses. RL plans to incorporate these comments as part of the Calendar Year 2012 report.

If you have any questions, please contact me or your staff may contact Al Farabee, of my staff, on (509) 376-8089.

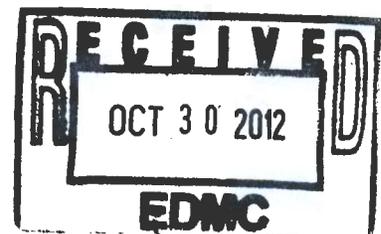
Sincerely,

Jonathan A. Dowell, Assistant Manager  
for the Central Plateau

AMRP:MSC

Attachment

cc: See Page 2



1213180  
1216179

Addressees  
13-AMRP-0001

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OCT 25 2012

cc w/attach:

D. Bartus, EPA  
G. Bohnee, NPT  
R. Buck, Wanapum  
S. Harris, CTUIR  
R. Jim, YN  
S. L. Leckband, HAB  
N. M. Menard, Ecology  
K. Niles, ODOE  
J. B. Price, Ecology  
D. Rowland, YN  
D. G. Singleton, Ecology  
E. R. Skinnarland, Ecology  
**Administrative Record**  
Environmental Portal

cc w/o attach:

K. R. Christensen, WCH  
M. E. Cole, BABS  
L. M. Dittmer, CHPRC  
R. H. Engelmann, CHPRC  
L. L. Fritz, MSA  
R. A. Kaldor, MSA  
S. E. Killoy, WRPS  
A. G. Miskho, CHPRC  
T. W. Noland, MSA  
J. F. Ollero, MSA  
J. K. Perry, MSA  
K. A. Peterson, MSA  
R. E. Piippo, MSA  
H. T. Tilden, PNNL

**Washington State Department of Ecology  
REVIEW COMMENT RECORD (RCR)**

1. Date **May 25, 2012**    2. Review No. 0

3. Project No. LDR                      4. Page 1 of 8

5. Document Number(s)/Title(s) 2011 Hanford Site Mixed Waste LDR Summary Rpt. DOE/RL-2012-12 Rev 0

6. Program/Project/Building Number NWP/Waste Management/RFO

7. Reviewers: Biebesheimer, Bond, Chang, Conaway, Gent, Lowe, Price, and Singleton

8. Organization/Group Ecology/NWP

9. Location/Phone RF0/372-7890

17. Comment Submittal Approval:

10. Agreement with indicated comment disposition(s)

11. CLOSED

Date    Organization Manager (Optional)

Date                      Reviewer/Point of Contact

Date                      Reviewer/Point of Contact

Author/Originator

Author/Originator

Item	Location in Document	Comment	Hold Point	Disposition (Provide justification if NOT accepted.)	Status
1	Global (Compliance)	For future LDR Reports, once Rev. 9 of the Hanford Site-Wide Dangerous Waste Permit goes into effect, we would expect waste volumes to be reported for each specific dangerous waste management unit. All storage of mixed waste including waste identified in the LDR report must be managed according to the permit authorization, 90-day storage areas (page 1-3 of the LDR report). Permittees are required to submit a permit modification or supplemental information to Ecology to determine permit authorization.		Not accepted. When Revision 9 of the Hanford Facility Dangerous Waste Permit goes into effect, DOE will be willing to discuss changes in reporting structure of the LDR Report with Ecology. DOE and Ecology will need to review requirements documents and past agreements to determine if changes are necessary to those documents in order to change the way waste is reported in the LDR Report. Impacts on the LDR Report can be assessed when Rev 9 of the Hanford Facility Dangerous Waste Permit goes into effect.  * This response applies to all comments noted by an asterisk. HFFACO (TPA) Action Plan Section 9.2.1, Page 9-1, states: "Comments shall refer to any pertinent sources of authority or references upon which the comments are based, and upon request of the DOE, the commenting agency shall provide copy of the cited authority of the reference." DOE requests for all LDR comments 1-15, Ecology please cite authority and provide copy of the reference.	





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7	Pg. 1-3 (Compliance)	The following text: "The tank "D-10 from cell 30" waste stream listed under the TRUM-RH treatability group location has been deleted from the report as the tank has been moved as part of the CERCLA remediation to CWC and the tank is now tracked in the CWC TRUM-RH location" needs to be elaborated and clarified. Was the tank empty? Is the tank itself, or the contents of the tank considered TRUM-RH waste? If the tank is considered a DWMU, closure should be addressed through the DW component assuming the tank contains mixed waste as of the effective date of regulations that cause this waste to be subject to DW requirements. DOE must provide documentation that all waste was removed from the tank prior to the effective date described above. How does the tank designate as mixed waste?	Accept. The waste quantity is now reported as both the tank and its contents (approximately 500 gallons of mixed waste) because the tank has been packaged into a container for storage at CWC. The containerized waste (tank and contents) will be stored at CWC until it can be prepared for disposal at WIPP. Due to the radiological constituents, this waste has been designated as transuranic mixed waste. The container is located within the CWC dangerous waste management unit. The container itself is not a dangerous waste management unit as defined by WAC 173-303-040. The request to provide documentation that all "waste was removed from the tank" does not apply to the storage configuration.*	
8	Table 1-1 (Lowe)	The 221-T Tank System group should include the volumes of the residual heels in the tanks. Estimates were provided previously.	Not accepted. The reported volume of zero cubic meters represents the liquid fraction having evaporated from the 6 tanks in the tank system consistent with the same value reported in CY2010. The CY2010 report was approved by Ecology.  In addition, the reporting methodology for the volume in the 211-T Tank System was also a subject of past LDR report comment resolutions in the CY2007 LDR Report (See DOE Letter July 28, 2008) prior to the liquid completely evaporating. The issue was resolved in the CY2007 LDR Report by deferring discussions to the monthly T Plant Project Managers Meeting and through email exchange.*	



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11	Table 1-4 (Compliance)	<p>Ecology is concerned by the waste described under the rows "Tank 241Z-361" and "T-Pant Canyon Cell 11-L." Why aren't these wastes listed in Table 1-1 as Mixed Waste instead of being listed in Table 1-4 as Solid Waste with the Potential to Become Mixed Waste? Mixed waste in storage that does not meet LDR treatment stds, must be included in the LDR report regardless if the waste is abandoned. Abandoned waste is still in storage and subject to the DW regulations.</p>	<p>Partial Accept. The waste in the 241-Z-361 and the T Plant Canyon Cell 11-L are not TSD storage locations, therefore the waste is not reported in the data sheets of the LDR report. There is no Part A Permit application showing that these areas are permitted storage locations. Discussions between DOE and Ecology in the past took place to classify the 241-Z-361 underground tank as a past practice site under the Tri-Party Agreement Waste Information Data System database. For the T Plant cells, discussions between Ecology and DOE took place during the Part B Permitting workshops in the 2002 timeframe where the delay in closure of the 221-T Tank System in the canyon cells took place. The Part A Permit application form for T Plant indicates which cells in the canyon are identified as part of the TSD unit. Cell 11-L is not one of those locations, and was readdressed with Ecology during the LDR compliance assessment/data gap plan process documented in the T Plant TPA Project Managers Meeting minutes on July 24, 2008. There is no known reason to revisit the reclassification of a past practice site to a TSD site for these locations in the potential mixed waste table.</p> <p>The waste in question is included in the LDR report. Waste is either reported in data sheets or as potential mixed waste in the LDR Report. The 241-Z-361 and T Plant Cell 11-L waste is included as potential mixed waste based on the agreement between Ecology and DOE resulting from the appeal and settlement of the 2000 LDR Final Determination on reporting mixed waste.</p> <p>However, it is noted that the potential mixed waste table, Column G entries for "T Plant Canyon Cell 11-L" and "T Plant Canyon IMUSTS" needs to be updated for the data gap plan to read: "Data gap plan: 3<sup>rd</sup> quarter CY2007. Currently Resolving Ecology comments. See July 24,</p>	
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12	Table 1-4 (Lowe)	The item Single-Shell Tank Farms includes contaminated unusable equipment and shows "None" for the materials with potential to become solid waste and subsequently mixed waste. The SST retrieval work must surely be generating some sort of solid waste given the pace of activity. However, it is unclear what the amounts of waste are and where it is going. The SST Waste group listed in Tables 1-1 and 1-2 only includes the tank waste itself and shows zero projected for 2012-2016. Perhaps the waste is included in one or more of the generic MLLW-0X groups, but those groups are only showing a collective total of 18.7 m3 (= 90 55-gallon drums) projected for 2012-2016, which seems low. Could DOE please clarify?	Accept. "None" was recorded in this column (E) as it was interpreted to mean that any materials generated would be placed in standby or reused, of which none was predicted at this time. Should this prediction change, it will be noted in the next LDR Report. Potential mixed waste is listed in column D.  SST waste is not included in the MLLW-01 through MLLW-10 treatability groups.*	
13	Table 1-5 (Lowe)	The spent ion exchange column from the 242-A Evaporator is shown as a Deleted Item from 2002. However, the 242-A Evaporator will continue to operate for some time in support of managing the tank waste. Ecology expected this facility to generate some sort of solid waste stream that is shown in the tables. Occasionally there are also upgrades to the facility which also generates solid waste. Perhaps the waste is included in one or more of the generic MLLW-0X groups. Could DOE please clarify?	Accept. Table 1-4 lists Potential Mixed Waste for the 242-A Evaporator including: liquids/solids in process tanks and contaminated equipment, piping, and debris. Waste should only be included in the MLLW-02 though MLLW-10 treatability groups if WRPS plans on generating a non-LDR compliant waste and will seek an exemption from DOE to store the waste in CWC.*	
14	Pg. 1-4; Section 1.3 (Compliance)	Please clarify the comment: "Past-Practices Waste is waste that was abandoned before... August 19th, 1987." Please clarify what is meant by the word "abandoned." Is the term strictly referring to land disposal or includes storage?	Accept. The term abandoned is used in the same context as how WAC 173-303-016 uses the term abandoned.*	

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REVIEW COMMENT RECORD (RCR)**

1. Date **May 25, 2012**    2. Review No. 0

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LDR

15	Pg. 2-1 (Compliance)	In the introductory text of Section 2.0, please note that DOE assessments are performed in accordance with all applicable regulatory requirements, including the Director's Final Determination of March 2000. ( <a href="http://www.ecy.wa.gov/programs/nwp/pdf/ldrfd.pdf">http://www.ecy.wa.gov/programs/nwp/pdf/ldrfd.pdf</a> )		Accept. A note will be added to Section 2.0 including the Director's determination.	
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