



U.S. Department of Energy Hanford Site

October 5, 2021

21-TF-003249

Mr. Jeffrey J. Lyon, Tank Systems Operations
And Closure Project Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Mr. Lyon:

U.S. DEPARTMENT OF ENERGY RESPONSE TO THE WASHINGTON STATE DEPARTMENT OF ECOLOGY LETTERS 21-NWP-081, "DEPARTMENT OF ECOLOGY'S REVIEW COMMENT RECORD (RCR) ON THE CLOSURE EXTENSION REQUEST FOR THE DOUBLE SHELL TANK 241-AY-102 (241-AY-102) TANK SYSTEM DANGEROUS WASTE MANAGEMENT UNIT" AND 21-NWP-070, "241-AY-102 CLOSURE EXTENSION REQUEST"

- References:
1. Ecology letter from J. J. Lyon to B. T. Vance, DOE, and J.R. Eschenberg, WRPS, "Department of Ecology's Review Comment Record (RCR) on the Closure Extension Request for the Double Shell Tank 241-AY-102 (241-AY-102) Tank System Dangerous Waste Management Unit," 21-NWP-081, dated June 1, 2021.
 2. Ecology letter from J. J. Lyon to B. T. Vance, DOE, and J. R. Eschenberg, WRPS, "241-AY-102 Closure Extension Request," 21-NWP-070, dated April 30, 2021.
 3. DOE letter from B. T. Vance to A. K. Smith, Ecology, "Closure Extension Request for the 241-AY-102 Tank System Dangerous Waste Management Unit," 19-ECD-0052, dated August 6, 2019.

The U.S. Department of Energy (DOE) has received and reviewed the Washington State Department of Ecology's (Ecology) response to letter 19-ECD-0052, closure extension request for the Double Shell Tank (DST) 241-AY-102, submitted by letter 21-NWP-070, dated April 30, 2021, and additional Ecology comments also responsive to 19-ECD-0052 submitted by letter 21-NWP-081 dated June 1, 2021, with review comment record attached.

DOE agrees with Ecology regarding the requirement for a written closure plan; however, DOE is not obligated to provide a closure plan for 241-AY-102, independent of the DST system. DOE submitted a DST system closure plan by letter 11-ESQ-321 on December 29, 2011. Ecology provided a completeness determination by letter 21-NWP-006 on January 26, 2012. Since that time DOE has worked with Ecology to review, revise, and approve the DST system closure plan.

DOE plans to continue incorporating closure requirements for 241-AY-102 into the closure plan for the DST system, as agreed and practiced in the Rev. 9 closure plan workshops with Ecology. DOE will incorporate comments made in both letters to revise the DST system closure plan and as needed, other DST permit information, i.e., inspections.

If you have any questions, please contact me, or your staff may contact Daniel B. Pearson, Environmental Compliance Division, on (509) 372-1692.

Sincerely,

**Brian A.
Harkins**

Digitally signed by
Brian A. Harkins
Date: 2021.10.05
16:36:09 -07'00'

Brian A. Harkins
Deputy Assistant Manager
Tank Farms Project

TF:REV

cc: J. Bell, NPT
R. Buck, Wanapum
J. Cantu, Ecology
A.S. Carlson, Ecology
L. Contreras, YN
S.L. Dahl-Crumpler, Ecology
D. Einan, EPA
R. C. Flynn, WRPS
J.R Hamilton, WRPS
S.S. Lowe, Ecology
J.J. Lyon, Ecology
J.W. Mathey, Ecology
N. Menard, Ecology
M. Murphy, CTUIR
R.W. Szelmeczka, WRPS
R.E. Varljen, WRPS
M. Woods, ODOE
S. Wiegman, HAB
Administrative Record
Environmental Portal WRPS
Correspondence