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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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August 17, 2012

12-NWP-140

Mr. Matthew S. McCormick  
Richland Operations Office  
United States Department of Energy  
P.O. Box 550, MSIN: A7-50  
Richland, WA 99352

Re: 2011 Hanford Site Mixed Waste Land Disposal Restrictions (LDR) Summary Report DOE/RL-2012-12, Rev 0 1213180

Dear Mr. McCormick:

The Department of Ecology (Ecology) has received and reviewed the Calendar Year 2011 Hanford Site Mixed Waste LDR Summary Report. Please find Ecology's comments enclosed with this report.

Ecology appreciates the efforts of the United States Department of Energy in preparing this report and we look forward to your responses to our questions and concerns within 45 days following receipt of this letter. If you have any questions, please contact me at 509-372-7923 or Albert Chang at 509-372-7929.

Sincerely,

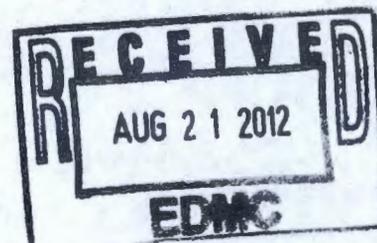
Deborah Singleton  
Waste Management Project Manager  
Nuclear Waste Program

ac/jvs  
Enclosure

cc w/enclosure:

Dennis Faulk, EPA  
Larry Romine, USDOE  
Mike Collins, USDOE  
Robert Piippo, MSA  
Stuart Harris, CTUIR  
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Susan Leckband, HAB  
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Correspondence Control, USDOE-RL



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

1. Date **May 25, 2012**      2. Review No.0  
3. Project No.                      4. Page      1 of 4  
LDR

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 RFO/372-7890
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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.			
2	Global (Gent)	The report makes references to Milestone M-26-01U (pg. 1-1), Milestone M-26-01V (pg. 1-3) and Milestone M-26-01R (pg. 5-1) which we were not able to find on the latest version of the Work Schedule posted online. Are these out of date references to earlier versions of the Work Schedule?			
3	Global (Compliance)	LDR report must identify the storage location by a specific DWMU, not a unit group. Otherwise, Ecology compliance cannot verify the location of a DWMU. Ecology wants to note that the TPA language will also need to be changed in the future to be consistent with Rev 9 of the Site Wide Dangerous Waste Permit.			
4	Pg. 1-3 (Compliance)	Please delete the reference to Ecology agreement and replace with the underlying regulatory basis that supports mixed waste generated and sent directly to disposal does not need to be reported in this LDR report.			

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5	Pg. 1-3 (Compliance)	<p>The following text is not clear:          "A new location was established for Liquid Effluent Retention Facility (LERF)/ETF liquid waste from the TX/TY Treatability Test Wells, where contaminated groundwater is pumped from the 200-ZP-1 Operable Unit at the TX/TY Tank Farm and conveyed to LERF/ETF."          Please provide specifics to what the new location is. LDR report needs to insure that the new location is subject to the storage requirements of M-91-26.</p>			
6	Pg. 1-3 (Compliance)	<p>The text states that "The railcars were dispositioned at either ERDF or the B-Reactor museum." Please clarify. If the Railcars are being used as product and therefore not waste, please avoid using the term "dispositioned." Were the railcars DWMU? Are the railcars mixed waste? Provide documentation that these railcars met the definition of an empty container effective date of the regulation that subjected them to DW regulations.</p>			
7	Pg. 1-3 (Compliance)	<p>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?</p>			
8	Table 1-1 (Lowe)	<p>The 221-T Tank System group should include the volumes of the residual heels in the tanks. Estimates were provided previously.</p>			
9	Tables 1-1 & 1-2 (Lowe)	<p>In looking at the generation projections for the DST Waste and SST Waste groups, it is unclear if the SST waste retrieval to DSTs and campaigns by the 242-A Evaporator to reduce the volume of DST waste is reflected in the estimates. Please clarify/confirm?</p>			

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10	Table 1-2 (Bond)	We noticed an increase in the Waste Quantity for 400 Area WMU – from 1.5 m <sup>3</sup> to 1.9 m <sup>3</sup> . We were told that this might have something to do with changes in conversion factors. Could DOE please clarify that no additional waste was generated and provide calculations and supplemental information to justify the increase in reported volume?			
11	Table 1-4 (Compliance)	Ecology is concerned by the waste described under the rows “Tank 241Z-361” and “T-Plant 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.			
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 m <sup>3</sup> (= 90 55-gallon drums) projected for 2012-2016, which seems low. Could DOE please clarify?			
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?			
14	Pg. 1-4; Section 1.3 (Compliance)	Please clarify the comment: “Past-Practices Waste is waste that was abandoned before... August 19 <sup>th</sup> , 1987.” Please clarify what is meant by the word “abandoned.” Is the term strictly referring to land disposal or includes storage?			

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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> )			
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