



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY  
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December 18, 2019

19-NWP-204

William F. Hamel, Assistant Manager  
Richland Operations Office  
United States Department of Energy  
PO Box 550, MSIN: H5-20  
Richland, Washington 99352

Re: Conclusion of Comment Resolution Activities for the *Calendar Year 2014 Hanford Site Mixed Waste Land Disposal Restrictions Full Report*, DOE/RL-2015-08, Revision 0

References: See page 3

Dear William F. Hamel:

The Department of Ecology (Ecology) received letter 19-PFD-0034 (Reference 1), letter reissue - 19-PFD-0034 (Reference 2), and letter 20-AMRP-0004 (Reference 3) regarding the *Calendar Year 2014 Hanford Site Mixed Waste Land Disposal Restrictions Full Report*, DOE/RL-2015-08, Revision 0 (2014 LDR Full Report).

Ecology agrees with the conclusion of comment resolution activities for the 2014 LDR Full Report. Ecology agrees that in lieu of reissuing the 2014 Full LDR Report, the changes documented in the review comment record and supporting documents resolve Ecology's comments for the 2014 LDR Full Report as noted within. The signed Primary Document Statement is enclosed.

The review comment record identifies the following information that will be included in the Calendar Year 2019 LDR Full Report:

- Projected mixed waste stream volumes to be treated during the next 5-year period.
- Greater detail on physical location of each mixed waste stream.
- Schedules for all mixed waste streams requiring treatment.
- Schedules for all waste streams requiring characterization.
- Identification of treatment technologies vs. stating, "Treatment not yet selected."  
If a treatment technology is available for a particular waste stream but has not yet been selected, the United States Department of Energy (USDOE) has the option of either identifying that treatment, or including a schedule for selecting a treatment technology.

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- References to current storage assessments for each mixed waste stream. All storage assessments will be publicly accessible in the USDOE Administrative Record by reference number.
- All wastes, as clarified in Ecology's January 25, 2000, letter to USDOE must be identified and included (Reference 4).

**Ongoing storage assessments.** The need for ongoing storage assessments will be determined annually in consultation with Ecology and USDOE Tri-Party Agreement Project Managers. Ecology will verify that adequate assessments are in place to ensure all mixed waste continues to be stored in a safe configuration.

As long as there are no outstanding compliance issues, dangerous waste management units (DWMU) located within operating unit groups in the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, for the Treatment, Storage and Disposal of Dangerous Waste*, Revision 8c will not require an ongoing storage assessment.

Also, as long as there are no outstanding compliance issues, DWMU operating under interim status technical standards in accordance with Permit Condition I.A will not require an ongoing storage assessment.

**Characterization and treatment schedules.** Characterization and treatment schedules will be incorporated into the Calendar Year 2019 LDR Full Report and future LDR Reports as described in the March 29, 2000, Director's Determination (Reference 5) and the March 14, 2002, Tri-Party Agreement Resolution of Dispute (Reference 6).

**Disagreement on tank in T Plant Canyon Cell 11-L.** Ecology and USDOE could not come to agreement on the regulatory status of a tank storing approximately 500 gallons of mixed waste in the T Plant Canyon Cell 11-L. This issue is currently in discussion with Ecology and USDOE attorneys.

**Revision of treatability groups.** Ecology and USDOE have agreed to take further action to review and revise, as necessary, existing treatability groups during the 2020 calendar year.

Treatability groups must be specific to each waste stream with common treatment requirements. Grouping waste streams with different treatment requirements prevents the assessment of treatment capacity and availability, which ultimately determines whether a particular waste stream needs a treatment schedule. *This is the main purpose of the LDR Report, and is needed in order to establish equivalency with the 1992 Federal Facility Compliance Act, Site Treatment Plan requirements.*

Ecology views this as an outstanding deficiency in the 2014 LDR Report. Ecology agrees to defer resolution of this issue to the 2020 Summary LDR Report (due in 2021), to account for time needed to make changes to the LDR database.

If you have any questions, please contact Ed Soto, Land Disposal Restrictions Project Lead, at [ed.soto@ecy.wa.gov](mailto:ed.soto@ecy.wa.gov) or 509-372-7933 or Kelly Elsethagen, Waste Management Project Manager, at [kelly.elsethagen.wa.gov](mailto:kelly.elsethagen.wa.gov) or 509-372-7923.

Sincerely,



Alexandra K. Smith  
Program Manager  
Nuclear Waste Program

ke/jlg  
Enclosure

- Reference 1: Letter 19-PFD-0034, dated July 30, 2019, "Conclusion of Comment Resolution Activities for the Calendar Year 2014 Hanford Site Mixed Waste Land Disposal Restrictions (LDR) Full Report, DOE/RL-2015-08, Revision 0"
- Reference 2: Letter 19-PFD-0034 REISSUE, dated July 30, 2019, "Reissue – Conclusion of Comment Resolution Activities for the Calendar Year 2014 Hanford Site Mixed Waste Land Disposal Restrictions (LDR) Full Report, DOE/RL-2015-08, Revision 0"
- Reference 3: Letter 20-AMRP-0004, dated November 6, 2019, "Supplemental Comment Resolution Activities for the Calendar Year 2014 Hanford Site Mixed Waste Land Disposal Restrictions (LDR) Full Report, DOE/RL-2015-08, Revision 0 and Primary Document Statement"
- Reference 4: Letter from Roger Stanley (Ecology) to George H. Sanders (USDOE) dated January 25, 2000, "Response to Request for Clarifications and Third Request for Documents Pertaining to the Federal Facility Compliance Act of 1992 (FFCA), DOE Compliance with RCRA Land Disposal Restrictions, and its Compliance with Hanford Facility Agreement and Consent Order (HFFACO) milestone series M-26"
- Reference 5: Letter from Tom Fitzsimmons (Ecology) and Chuck Clarke (EPA Region 10) to Richard T. French (USDOE Office of River Protection) and Keith A. Klein (USDOE Richland Field Office), "Final Determination pursuant to the Hanford Federal Facility Agreement and Consent Order (HFFACO) regarding the U.S. Department of Energy's (DOE) compliance with Land Disposal Restriction (LDR) requirements of Washington State's Hazardous Waste Management Act (HWMA) and the federal Resource Conservation and Recovery Act (RCRA), DOE's annual Land Disposal Restrictions Report, and HFFACO milestone M-26-01"

Reference 6: Document: Tri-Party Agreement Resolution of Dispute Pertaining to Hanford Federal Facility Agreement and Consent Order Calendar Year 2000 Hanford Site Mixed Waste Land Disposal Restrictions Report, dated March 14, 2002

cc electronic w/enc:

Dave Bartus, EPA  
Craig Cameron, EPA  
Dave Einan, EPA  
Bryan Trimberger, USDOE-ORP  
Duane Carter, USDOE-RL  
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John Temple, Ecology  
Kim Welsch, Ecology  
Environmental Portal  
Hanford Facility Operating Record  
BNI Correspondence Control  
CHPRC Correspondence Control  
MSA Correspondence Control  
PNNL Correspondence Control  
USDOE-ORP Correspondence Control  
USDOE-RL Correspondence Control  
USEPA Region 10 Hanford Field Office  
Correspondence Control  
WRPS Correspondence Control

cc w/enc:

Mason Murphy, CTUIR  
Jack Bell, NPT  
Rex Buck, Jr. Buck, Wanapum  
Laurene Contreras, YN  
Susan Leckband, HAB  
Administrative Record  
NWP Central File

**PRIMARY DOCUMENT STATEMENT**

**CALENDAR YEAR 2014 HANFORD SITE MIXED WASTE LAND  
DISPOSAL RESTRICTIONS FULL REPORT**

Approval of the U.S. Department of Energy's annual land disposal restriction report as a *Hanford Federal Facility Agreement and Consent Order* primary document shall be by written approval of U.S. Department of Energy and Washington State Department of Ecology Interagency Management Integration Team representatives.

This document has been prepared, submitted, revised, and approved as a primary document in response to the requirements of the *Hanford Federal Facility Agreement and Consent Order* milestone series M-026-01 and related *Resource Conservation and Recovery Act of 1976* land disposal restrictions and *Hanford Federal Facility Agreement and Consent Order* requirements. As such, this document serves as a binding and enforceable document under the *Hanford Federal Facility Agreement and Consent Order*.

Approved and issued this 5<sup>th</sup> day of Nov 2019.



W. F. Hamel, Assistant Manager  
for the River and Plateau  
U.S. Department of Energy,  
Richland Operations Office



A. K. Smith, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology



B. A. Harkins, Assistant Manager  
for the Tank Farms Project  
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