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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 3, 2019

19-NWP-194

Brian A. Harkins, Deputy Assistant Manager, Tank Farms
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Department of Ecology's (Ecology) Review and Assessment of the *Maintenance and Performance Monitoring Plan*, RPP-RPT-61684

Reference: See Page 2

Dear Brian A. Harkins:

Ecology has reviewed and assessed the contents of the *Maintenance and Performance Monitoring Plan*, RPP-RPT-61684.

The United States Department of Energy – Office of River Protection has failed to submit a primary document pursuant to *Hanford Federal Facilities Agreement Consent Order*, Milestone M-045-92. Pursuant to Article IX, second paragraph of 31, "DOE shall have seven (7) days after receipt of the assessment to invoke Dispute Resolution on the question of whether the failure did in fact occur."

As described in Milestone M-045-92, the *Maintenance and Performance Monitoring Plan* will address:

- Systematic inspections and maintenance of the interim barriers to ensure their performance over their 25-year service life.
- A plan to perform systematic performance monitoring of tank farms covered with interim barriers. For each tank farm with an interim barrier, the plan will evaluate and propose, as appropriate:
 - In-tank monitoring (e.g., surface level and liquid observation wells), and ex-tank drywell monitoring.
 - Results of completed drywell monitoring data collection and evaluation.
 - Results of completed tank leak assessments.
- Submit yearly reports summarizing the results of maintenance and performance monitoring activities for the previous year, and research completed to evaluate new technologies.



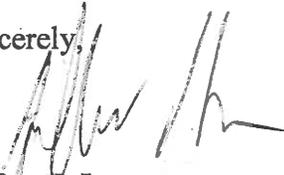
Brian A. Harkins
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The *Maintenance and Performance Monitoring Plan* will be updated and revised with the submittal of each interim barrier design submittal.

If you have any questions, please contact me at jeff.lyon@ecy.wa.gov or (509) 372-7914.

Sincerely,



Jeffery J. Lyon
Tank Systems Operation and Closure Project Manager
Nuclear Waste Program

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Reference: Letter 19-TPD-0027, dated October 31, 2019, "Completion of Maintenance Performance and Monitoring Plan Submittal to Meet Hanford Federal Facility Agreement and Consent Order Milestone M-045-92AC"

cc electronic:

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Jon Perry MSA
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