



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950
711 for Washington Relay Service • Persons with a speech disability can call (877) 833-6341

November 13, 2020

20-NWP-184

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

Re: Response to Letter 20-TF-0091, Waste Management Area A-AX Performance Assessment,
and Attached Documents RPP-ENV-62206 and RPP-ENV-61497

References: See page 3

Dear Brian A. Harkins:

The Department of Ecology (Ecology) acknowledges receipt of letter 20-TF-0091 with two attached documents (Reference 1) that comprise a portion of the of two documents that comprise a portion of the *Hanford Federal Facility Agreement and Consent Order* (TPA) Action Plan Appendix I, Section 2.5 for Waste Management Area (WMA A-AX).

Ecology intends to provide our comments on these documents by March 15, 2021, with the possible exception of comments from our subcontractor. The 45-day review period set forth in TPA Action Plan Figure 9-1 would end on November 15, 2020. The additional time is necessary due in part to the need to review more than 15 supporting documents. Some of those documents are currently going through the United States Department of Energy's (USDOE) clearance process and are not yet available to Ecology.

Ecology requires assessments of risks associated with existing contamination in the vadose zone and all associated exposure pathways. USDOE must provide evaluation of risks associated with current conditions projected into the future, and evaluation of the degree of risk reduction provided by proposed closure actions. The exposure pathways requiring risk evaluation are human direct contact, ecological receptors, protection of water resources, and protection of air, as described in Washington Administrative Code (WAC) 173-303-610 and WAC 173-340-700 through -760.

Furthermore, there are a number of pipelines and other ancillary equipment located at a depth of less than 15 feet below ground surface. Therefore, USDOE must submit assessments of risk of the pipelines and ancillary equipment for each of the above exposure pathways. The risk assessments must be done for both current conditions projected into the future and for conditions after completion of proposed closure actions.

Ecology previously provided an outline (Reference 2) indicating how the information above should be incorporated into a single performance assessment. This is required by TPA Appendix I, Section 2.5, in which the Tri-Parties agreed, “to develop and maintain as part of the SST system closure plan one performance assessment for the purposes of evaluating whether SST system closure conditions are protective of human health and the environment for all contaminants of concern, both radiological and non-radiological.”

However, the attachments to Letter 20-TF-0091 have not combined the information as required, nor has USDOE provided a schedule to submit the outstanding information required by TPA Appendix I, Section 2.5. Ecology emphasizes our need for the combined document and a complete Appendix I Performance Assessment.

Ecology acknowledges receipt of 19-TF-0001, where USDOE expressed their intent to maintain the segregation of certain portions of the Appendix I Performance Assessment for WMA A/AX. Such segregation is inconsistent with Section 2.5 of Appendix I, which clearly states that each WMA’s PA “is expected to provide a single source of information that DOE can use to satisfy potentially duplicative functional and/or documentation requirements.”

Although the Tri-Parties are currently discussing potential changes to TPA Appendix I in the context of holistic negotiations, the Tri-Parties have not agreed to any proposal revisions. Accordingly, the existing requirements of Appendix I continue to apply, and Ecology expects USDOE to comply with its obligations under the TPA in regards to his matter.

If you have questions or concerns, please contact me at jeff.lyon@ecy.wa.gov or (509) 372-7914, or Beth Rochette, Toxicologist, at beth.rochette@ecy.wa.gov or (509) 372-7922.

Sincerely,



Digitally signed by Lyon,
Jeffery (ECY)
Date: 2020.11.13 15:30:47
-08'00'

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

kr/lkd

cc: See page 3

References:

1. Letter 20-TF-0091, dated September 29, 2020, “The U.S. Department of Energy, Office of River Protection, Transmittal of RPP-ENV-61497, Preliminary Performance Assessment of Waste Management Area A-AX, Hanford Site, Washington, Revision 0, and RPP-ENV-62206, Analysis of Post-Closure Groundwater Impacts from Hazardous Chemicals in Residual Wastes in Tanks and Ancillary Equipment at Waste Management Area A-AX at the Hanford Site, Southeast Washington, Revision 0”
2. Letter 18-NWP-176, dated November 8, 2018, “Structure of the Appendix I Performance Assessment (IPA) for Waste Management Area (WMA) A/AX”

cc electronic:

David Einan, EPA	Damon Delistraty, Ecology
Christopher Kemp, USDOE-ORP	Dib Goswami, Ecology
Rod Lobos, USDOE-ORP	Theresa Howell, Ecology
Brian Vance, USDOE-ORP	John Price, Ecology
Jon Perry, MSA	Beth Rochette, Ecology
Marcel Bergeron, WRPS	Kyle Rucker, Ecology
Paul Rutland, WRPS	Maria Skorska, Ecology
Mason Murphy, CTUIR	Devon Silva, Ecology
Jack Bell, NPT	Nina Menard, Ecology
Rex Buck, Jr., Wanapum	Jerry Yokel, Ecology
Laurene Contreras, YN	NWP RIM Coordinators, Ecology
ERWM Staff, YN	Environmental Portal
Susan Leckband, HAB	Hanford Administrative Record
David Reeploeg, Hanford Communities	Hanford Facility Operating Record
Max Woods, ODOE	MSA Correspondence Control
Scott van Verst, WDOH	USDOE-ORP Correspondence Control
Jim Alzheimer, Ecology	USDOE-RL Correspondence Control
Mike Barnes, Ecology	WRPS Correspondence Control