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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 27, 2011

11-NWP-048

Mr. Christopher J. Kemp, Deputy Federal Project Director
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Review of *Single-Shell Tank System Component Identification and Proposed Closure Strategy*, RPP-PLAN-41977, Revision 0, for Fulfillment of Hanford Federal Facility Agreement and Consent Order (HFFACO) Milestone M-045-101

Dear Mr. Kemp:

Ecology reviewed the *Single-Shell Tank System Component Identification and Proposed Closure Strategy* (reference). The document is consistent with the expectations of HFFACO Milestone M-45-101.

The enclosed Review Comment Record contains our comments for your response and resolution. Disposition of these comments and the update of the document, consistent with HFFACO Action Plan, Section 9.2, can be discussed in the Waste Management Area C Farm Closure meetings.

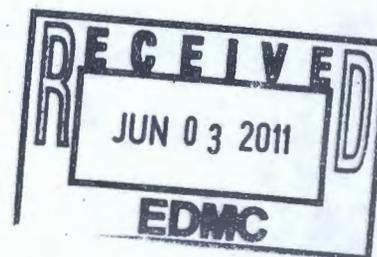
If there are any questions, contact me at 509-372-7914.

Sincerely,

Jeffery L. Lyon
Tank Waste Storage Project Manager
Nuclear Waste Program

aa
Enclosure

cc: See page 2



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Reference: Letter 10-TPD-176, dated December 28, 2010, from T. W. Fletcher, USDOE-ORP, to J. A. Hedges, Ecology, "Submittal of Documentation in Fulfillment of Hanford Federal Facility Agreement and Consent Order (HFFACO) Milestones M-045-100 and M-045-101" 0092910

cc w/enc:

Dennis Faulk, EPA
John Martell, EPA
Bob Lober, USDOE
Scott Samuelson, USDOE
Bruce Sullivan, LMSI
Jennifer Ollero, MSA
Rob Piippo, MSA
Judy Vance, MSA
Janet Badden, WRPS
Susan Eberlein, WRPS
Steve Killoy, WRPS
Jeff Luke, WRPS
Scott Sax, WRPS
Lela Buck, Wanapum
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Susan Leckband, HAB
Ken Niles, ODOE
Administrative Record: Tank Waste Storage: M-45-101
Environmental Portal
USDOE-ORP Correspondence Control
WRPS Correspondence Control

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Document Number(s)/Title(s) Single-Shell Tank System Component Identification and Proposed Closure Strategy (RPP- PLAN-41977, Rev. 0)	Program/Project/Building Number Ecology/Nuclear Waste Program	Reviewer M. Hendrickson J. Lyon B. Jentzen K. Wold, Lead	Organization/Group Tank Waste Storage	Location/Phone 372-7985
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Comment Submittal Approval:

Agreement with indicated comment disposition(s)

Status:

Organization Manager (Optional)

Date

Reviewer/Point of Contact

Date

Reviewer/Point of Contact

Author/Originator

Author/Originator

Item	Page #, Line #, or Section and Paragraph	Comment (s) (Provide technical justification for the comment and detailed recommendation of the action required to correct/resolve the discrepancy/ problem indicated)	Hold Point	Disposition (Provide justification if NOT accepted)	Status
1.	General	Comment: The purpose and scope of this document is for components associated with the single-shell tank system. The milestone refers to catch tanks and associated pipelines. Is this plan intended to cover all SST components or is it limited to the catch tanks and pipelines? Modification Needed: Clarify intent of document.			
2.	General	Comment: US DOE did not propose milestones or have a schedule for all components. No clear schedule is provided for component closure. Modification Needed: Provide schedule with deliverables and the decision process for closure of components.			
3.	General	Comment: This document appears to state that IS-1 includes all of the tank farm ancillary equipment outside of the WMA boundary. Modification Needed: If IS-1 is to include all tank farm components, provide the schedule and component details for closure.			
4.	Globally	Comment: No formal assessment has been performed or approved by	X		

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		<p>Ecology to list any SST system “components” as “past practice.”</p> <p>Modification Needed: Delete all text, figures and tables containing this language as it is not applicable.</p>			
5.	Globally	<p>Comment: The text in most of the figures and tables are illegible.</p> <p>Modification Needed: Include figures and tables that can be read.</p>			
6.	Globally	<p>Comment: The Central Plateau Strategy is a DOE document and is not a decision document. Decisions are made via the CERCLA/RCRA decision documents or permit conditions not through strategies.</p> <p>Modification Needed: Remove all references to the Central Plateau Strategy.</p>			
7.	p. 1-2, bullet “b” and the following paragraphs	<p>Comment: The bullet and supporting paragraphs below state that the SST system must be closed as a TSD, which was and continues to be in use for the sole purpose of waste storage until the waste can be removed.</p> <p>Modification Needed: Clarify that all references to “past practice” components including text, figures and tables containing this language are to be closed as a TSD (Reference HFFACO, Action Plan Section 5.5), as applicable.</p>			
8.	p. 1-2, Section 1.2.1, paragraph 2	<p>Comment: The most recent SST Part A revision is Revision 13 being submitted in March 2011. Will this document be revised to incorporate components, pipelines, etc. as they are identified?</p> <p>Modification Needed: Provide a process to incorporate components, pipelines, etc. as they are identified.</p>			
9.	p. 1-3, Figure 1-1	<p>Comment: The figure states that “old evaporators” are not part of the SST system. However, these facilities were used to store and treat waste from the SST system. All Evaporator facilities are adjacent to their respective tank farms and will likely be included in those farm’s closure</p>			

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		<p>activities. The 242-A Evaporator serves the same mission today.</p> <p>Modification Needed: Thus, these facilities should be included as TSD components and not past practice units. Make this change globally within the document.</p>			
10.	Pg. 1-4, 1 st paragraph	<p>Comment: The SST System is not limited to the bounds of the fence lines.</p> <p>Modification Needed: Clarify that closing the SST System is not solely related to the fence lines.</p>			
11.	p. 1-4, Section 1.2.2, bulleted listing of components	<p>Comment: Explain why this listing of components is not part of the SST system pursuant to regulatory definition.</p> <p>Modification Needed: Provide a basis for Ecology approval.</p>			
12.	p. 1-6, 1 st paragraph	<p>Comment: The assumptions explained in the first paragraph are not clear on the role of permitting and closure decision making. Landfill closure is indicated as assumed however the method of agreement is not.</p> <p>Modification Needed: Between sentence 2 and 3 of the first paragraph, please include:...closure strategies.... "All of these assumptions will be clarified by submittal of permit modifications confirming these actions, before work can be initiated". This assumption may be valid on a case-by-case basis, but is not valid as a general statement. Delete or refine the assumption.</p>			
13.	p. 1-6, 1 st paragraph	<p>Comment: The text states: "Should these assumptions change due to new direction or information..."</p> <p>Modification Needed: This sentence should be re-phrased to state "It is likely these assumptions will change due to new direction that will be provided by Ecology so that this document meets the regulatory requirement of WAC 173-303."</p>			
14.	p. 1-6, bullets	<p>Comment: These bullets discuss SST components located inside and</p>			

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	"d" & "e"	<p>outside of assumed cap areas. However, Ecology is unaware that any closure decisions have been made or will be made in conjunction with the design basis for caps. The outcome of 200-IS-1 OU discussions by USDOE/RL and ORP, Ecology may result in a change in understading.</p> <p>Modification Needed: Delete or refine these assumptions.</p>			
15.	Pg. 1-6, d	<p>Comment: Change the wording as follows.</p> <p>Modification Needed: Single-shell tank system components located within an assumed cap area will be characterized and/or remediated using the process associated with the WMA, canyon, or other major waste site(s) for which the capping remedy was selected. The "closure decision" for SST components will occur in the Sitewide Permit.</p>			
16.	Pg. 1-6, e.	<p>Comment: Change the wording as follows.</p> <p>Modification Needed: Single-shell tank system....cap are will be characterized and/or remediated in association with the process for 200-IS-1.....(e. g., excavation.....excavated) The "closure decision" will occur in the Site-wide permit.</p>			
17.	p. 1-6, bullet "g"	<p>Comment: The bullet states that RD/RA work plans approved by EPA and/or Ecology will be used to establish schedules for closure. Currently, RD/RA work plans are not part of SST closure. If the components are listed in the Part A, then Ecology needs to approve these proposed actions and schedules for those specific sites through the permit.</p> <p>Modification Needed: Rephrase your text to state this fact.</p>			
18.	p. 2-1, Section 2.1, 1 st paragraph	<p>Comment: The text states: "The HFFACO...of the EPA, Ecology, and ORP for..." The HFFACO applies to both RL and ORP.</p> <p>Modification Needed: Change "ORP" to "DOE".</p>			
19.	p. 2-1, Section	<p>Comment: This paragraph discusses the SST system's Part A.</p>			

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	2.1, 2 nd paragraph	<p>However, it neglects to note that the Part A is updated annually for completeness.</p> <p>Modification Needed: Add the following sentence to the end of the paragraph... "However, the Part A is incomplete and additional tasks are required to update it with the missing components."</p>			
20.	p. 2-1, Section 2.1, 3 rd paragraph	<p>Comment: The text states: "Clean-up of past practice units will occur..." This approach is not accurate.</p> <p>Modification Needed: Revise the text to state, "Clean-up of units will occur through an integrated RCRA/CERCLA approach."</p>			
21.	p. 2-1, Section 2.1, 3 rd paragraph	<p>Comment: The text states: "Single-shell tank system components that were..." However, not all SST components have been identified on the Part A or are listed in Appendix B of the HFFACO.</p> <p>Modification Needed: Change the text to, "Some of the SST system components..."</p>			
22.	p. 2-1, Section 2.1, 3 rd paragraph	<p>Comment: : The text states: "Clean-up of past practice units...and those that were recognized as past practice components were included in Appendix C..." Some of the SST components may have mistakenly been evaluated and labeled as RPPs, which was incorrect. These units should be relisted as TSDs and moved to Appendix B.</p> <p>Modification Needed: Change the listing of these units in WIDS to TSDs.</p>			
23.	Pg. 2-2, 1 st paragraph	<p>Comment: This sentence is incorrect. SST system components are not past practice. All SST system components are part of the TSD facility regardless of where the components are located. (WAC 173-303-640 , 40 CFR Subpart J, and HFFACO Action Plan, Section 5.5)</p> <p>Modification Needed: Remove the last sentence in this paragraph.</p>			

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		Replace with: Appendix I does not state how/when the components that are located outside of the WMA will be remediated. This will be covered in the SST Closure Plan.			
24.	p. 2-1, Section 2.1, 3 rd paragraph	<p>Comment: This paragraph does not note that the HFFACO's Appendix B and C, the SST Part A, and WIDS are all incomplete and need work to ensure all SST components are captured and that these sources of data are consistent.</p> <p>Modification Needed: Add the following sentence to the end of the paragraph. "However a current listing of OU boundaries, regulatory assignments, and site type are inconsistent among the WIDS data base, the SST Part A, and both Appendix B and C of the HFFACO.</p>			
25.	p. 2-2, 2 nd paragraph	<p>Comment: This paragraph notes that SST components outside of the WMA may be closed "in tandem" with CERCLA RAs. However this will be a case by case determination made by Ecology upon review and approval of a closure plan and design documentation for these sites as incorporated into the CERCLA actions.</p> <p>Modification Needed: Revise this section to state these requirements.</p>			
26.	Section 2.2	<p>Comment: This section is missing the corrective action portion for the environmental media. Also is missing regulation which allows the state to use alternative closure under WAC 173-303-610(1)(e) and/or WAC 173-303-645(1)(e).</p>			
27.	Pg. 2-2, Section 2.2.1	<p>Comment: This synopsis of the regulatory requirements is missing the corrective action for the soils.</p> <p>Modification Needed: Add text for corrective action WAC 173-303-646.</p>			
28.	p. 2-3, 1 st paragraph	<p>Comment: The text is missing some of the regulatory requirements for landfill closure requirements which are in WAC 173-303-640(8)(b) and WAC 173-303-665.</p>			

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		Modification Needed: Include the requirements.			
29.	p. 2-3, 1 st paragraph	Comment: The paragraph notes that "Financial Requirements" must be met by DOE for closure. However, Federal projects have an exclusion from this requirement, as noted in the Site Wide permit. Modification Needed: Delete "Financial Requirements."			
30.	p. 2-3, bullet "a"	Comment: This bullet is incomplete as written. Modification Needed: Change the bullet to state "Provide long-term prevention of environmental releases including minimization of migration of liquids and emanation of gasses through the closed landfill, and biological intrusion."			
31.	p. 2-3, 2 nd paragraph	Comment: A discussion of institutional controls after post closure Monitoring is missing. Modification Needed: Include a discussion of what institutional controls may be in place after the post-closure period for the assumed case of landfill closure.			
32.	p. 2-3, Section 2.2.2	Comment: Again, this section does not note that the SST Part A and WIDS and Appendix B of the HFFACO are incomplete. ORP is required to update the Part A on an annual basis to list the components that are missing. Modification Needed: Add the following sentence, "However an updated version of the SST Part A with additional components is due to Ecology annually."			
33.	p. 2-4, Section 2.3	Comment: Again, a discussion of institutional controls is missing. Modification Needed: Include this discussion, including time frames, and assumptions made in the SST-PA regarding long-term risk and			

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		inventory containment.			
34.	p. 2-5, Section 2.5	<p>Comment: As all SST components are listed in the Part A, this section regarding Past Practice sites is not applicable.</p> <p>Modification Needed: Delete this section. Should this section be kept, it drastically needs to be re-written to explicitly state that an integrated RCRA Corrective Action/CERCLA remedial action approach would be taken on a case by case basis.</p>			
35.	p. 2-6, Section 2.5.3	<p>Comment: The text states: "One specific...encompasses SST system pipelines..." Again this statement does not account for all of the SST components. Not all of them outside the WMA fence lines are listed in the 200-IS-1 OU for example: 241-CR-152-U3A, 241-U-151.</p> <p>Modification Needed: Modify the text to state, "...encompasses some of the SST system's pipelines and..."</p>			
36.	Pg. 2-6, Section 2.5.3	<p>Comment: The sentence states <i>Changes call for the</i></p> <p>Modification Needed: State the TPA change package or milestones that made these changes. Also delete the last sentence. See global comment about the Central Plateau Strategy.</p>			
37.	Global	<p>Comment: A listing of WMC-C PA assumptions and ARARs are missing.</p> <p>Modification Needed: Clarify the relationship of this strategy to assumptions of the PA and closure decision making.</p>			
38.	p. 4-1, bullets	<p>Comment: A bullet regarding the risk of any inventory present is missing as a key assumption for this strategy for closure. Also, in the second bullet, regarding a component is a TSD or past practice, The paragraph above does not clearly reflect the application of see HFFACO Action Plan, Section 5.5. RCRA corrective action and CERCLA remedial actions can be one in the same.</p>			

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		Modification Needed: Add a new first bullet regarding the “inventory present within a component,” and modify the paragraph to reflect the HFFACO Section 5.5 process.			
39.	p. 4-1, 3 rd paragraph	Comment: The text states: “This is principally... and remediate (or partially remediate)...” Barriers or caps do not remediate waste within a location. Rather, this technology simply contains waste in a configuration of safe storage. Modification Needed: Delete “remediate (or partially remediate)” and substitute with “contain.”			
40.	p. 4-1, 3 rd paragraph	Comment: The text states: “Closure actions...sites would be evaluated and selected...” These sites could be evaluated and may be selected to undergo CERCLA actions. But no decisions have been provided for specific cases and no approvals from Ecology granted. Modification Needed: Re-write this text to ensure that an integrated RCRA Corrective Action with CERCLA remedial actions could be possible on a case-by-case basis.	X		
41.	Pg. 4-2, Table 4-1	Comment: This table is incorrect as written. Modification Needed: Incorporate changes identified in red-line strike-out table on last page of this RCR.			
42.	p. 4-3, 1 st paragraph	Comment: The text states: “All SST components, both TSD and past practice ...” This statement is not clear. HFFACO Action Plan, Section 5.5 indicates the relationship practice activities of TSD and past practice. Modification Needed: Clarify the sentence.			

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43.	Pg.4-3, Section 4.1.2	<p>Comment: Strategies are not where decisions are made. Agreements are made in the decision document.</p> <p>Modification Needed: Update this to include current decision making milestones.</p>			
44.	Pg. 4-3, Section 4.1.2, 2 nd paragraph	<p>Comment: 200-IS-1 is a CAD/ROD.</p> <p>Modification Needed: Update to reflect current milestones and change RPP to R-CPP in text.</p>			
45.	p. 4-3, Section 4.1.2, 1 st paragraph	<p>Comment: The text states: "For the Inner Area, CERCLA...of remedies." This approach really is not specified in the TPA. It may be a goal of the new strategy, but is not required in the TPA.</p> <p>Modification Needed: Re-draft these phrases to better align with the actual requirements of the TPA changes or delete these phrases.</p>			
46.	p. 4-3, Section 4.1.2, 1 st paragraph	<p>Comment: The text states: "This approach will ensure...CERCLA and RCRA remedy selection." Again, this is a goal, but not a fact of the TPA re-alignment of the Central Plateau.</p> <p>Modification Needed: Re-phrase this sentence to list this as a goal; nothing is assured by the reorganization. Also, the text should reference a case-by-case integrated RCRA Corrective Action/CERCLA remedial action approach. Or delete this section.</p>			
47.	p. 4-3, Section 4.1.2, 2 nd paragraph	<p>Comment: The text states that the 200-IS-1 OU contains "both past practice and TSD SST components." This phrase is incorrect. All SST components are TSD components and subject to RCRA closure.</p> <p>Modification Needed: Delete "both past practice and".</p>			
48.	p. 4-4, 1 st paragraph	<p>Comment: This paragraph notes that the 241-UX-302A catch tank and 241-UX-154 Diversion Box will be closed by installation of the U Plant Canyon barrier as a CERCLA action. However, Ecology has not</p>	X		

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		<p>approved this as an appropriate method for these SST components to be closed.</p> <p>Modification Needed: Update the text to state that this CERCLA remedial action may be sufficient once a closure plan and the barrier design have been submitted to Ecology for review and approval. Include a schedule for this action.</p>			
49.	p. 4-4, 2 nd paragraph	<p>Comment: The last sentence of the paragraph is inaccurate as written.</p> <p>Modification Needed: Modify the sentence to read, "...through a RCRA Corrective Action associated with past practice decision making process. However, final Closure Plans will be submitted to Ecology for approval per scheduling requirements noted in WAC 173-303."</p>	X		
50.	p. 4-4, last paragraph	<p>Comment: This paragraph can lead to an assumption that the barrier designs are approved and not subject to change, which is incorrect.</p> <p>Modification Needed: Clarify this by adding the following sentence to the end of the paragraph... "However, these barrier designs and sizes are subject to change and other clean-up strategies would be required and even still may be required for the SST components prior to RCRA Closure."</p>	X		
51.	p. 4-5 to 4-9, Tables 4-2 to 4-4	<p>Comment: The HFFACO Appendix C column is not applicable for SST Component Closure as stated previously.</p> <p>Modification Needed: Delete this column from all tables.</p>			
52.	p. 4-5 to 4-9, Tables 4-2 to 4-4	<p>Comment: It is highly unlikely that all of the SST system components are listed in the tables.</p> <p>Modification Needed: Add a footnote to each of the tables to state this fact and reference where this data was obtained. Also note that more data will be added to these tables as additional components are found.</p>			

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53.	p. 4-5 to 4-9, Tables 4-2 to 4-4	<p>Comment: It was noted in the Tables that not all of the SST Components are listed in the Part A, or Appendix B, or even WIDS.</p> <p>Modification Needed: Add footnotes where “No” is indicated in the tables that these components will be added to the Part A, Appendix B and WIDS.</p>			
54.	p. 4-10, 1 st paragraph	<p>Comment: The text states: “Yet there is no consistent design standard or practice for protective side slopes.” This statement is incorrect as written. While there may not be a prescriptive regulatory requirement for a cap side slope, there is modeling based on climate data and physical material properties used in cap construction that dictate very standard designs for cap slopes.</p> <p>Modification Needed: Delete this sentence or explain how standard cap side slope designs are actually developed.</p>			
55.	p. 4-10, 2 nd paragraph	<p>Comment: The text states: “Final component closure...and past practice evaluations are developed.” This is not correct as written.</p> <p>Modification Needed: Modify the sentence to read” “Final component closure...and integrated past practice evaluations in closure zones are developed.”</p>			
56.	p. 4-10, bullets “a” and “d”	<p>Comment: These bullets are not accurate or appropriate.</p> <p>Modification Needed: Delete these bullets.</p>			
57.	p. 4-10, bullets	<p>Comment: A bullet for the risk associated with component inventory is missing.</p> <p>Modification Needed: Add this as the first bullet.</p>			
58.	p. 4-10, bullet “b”	<p>Comment: The bullet states “Changes in assumed closure end states (e.g., capping versus removal).” However, changes in end states may or may not drive a different RCRA Corrective Action. These are not</p>			

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		necessarily linked. Modification Needed: Delete "(e.g., capping versus removal)"			
59.	p. 4-10, bullet "c"	Comment: The bullet states "Changes in assumed cap footprints." However, changes in cap design would be more accurate. Modification Needed: Delete "footprints" and add "design."			
60.	p. 4-10, Section 4.2.2, 1 st paragraph	Comment: The text states: "The majority...is not considered to be complete...SST System." This sentence is phrased improperly. Modification Needed: Change the text to state "The majority...is not complete...SST System until all components are listed."			
61.	p. 4-10, Section 4.2.2, 2 nd paragraph	Comment: This paragraph is poorly written and inaccurate. Modification Needed: Either delete the paragraph or change it to read..."The location of waste transfer pipelines will influence how they are closed. Approximately 270 pipelines have been identified that reside entirely outside of the WMAs and will be closed in a manner that is consistent with the closure performance standards. Approximately 180 pipelines transect the WMA fence lines. The decision logic for RCRA Corrective Actions and closure of these pipelines will be delineated following an agreed to decision logic developed between DOE and Ecology..."	X		
62.	p. 4-11, 1 st paragraph	Comment: The last sentence of the first paragraph is inaccurate. Modification Needed: Delete this sentence. All SST components will be closed via the site-wide permit.			
63.	p. 4-11, Section 4.3	Comment: Not all of the Central Plateaus OUs are listed for integration and scheduling purposes. Modification Needed: Include 200-WA-1, T-Plant, U-Plant, and others	X		

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		that are missing with their associated milestones and dates.			

Refer to Comment 41. **MODIFICATION NEEDED:**
Redline / Strikeout Revisions to Table 4-1:

Table 4-1. Proposed Single-Shell Tank System Component Closure Strategy

Component Location	TSD or Past Practice Component	Associated Closure Action Pathway	Closure Document Process Decision	Characterization and/or Remedy Cleanup Actions	Rationale for Closure Strategy	Regulatory Basis
Within the probable effective edge of a WMA cap	TSD	WMA	RCRA TSD Closure Plan	RCRA TSD Closure Plan	Within a common SST WMA landfill closure action that will be authorized through Site-Wide Permit	HFFACO Action Plan Sections 6 and 9.2.2; Appendix B as updated through SST System Part A Permit Application
	Previously Designated Past Practice	WMA	RCRA TSD Closure Plan	RCRA TSD Closure Plan	Within a common SST WMA landfill closure action that will be authorized through Site-Wide Permit	HFFACO Action Plan Sections 7 and 9.2.1; Site-Wide Permit Condition II.Y.2; HFFACO Appendix D Milestone M-045-00
Within the probable effective edge of a past practice cap or remedy	TSD	Inner Area Geographic Decision Unit	RPP or CPP Process and/or RCRA TSD Closure Plan	R-CPP or CPP RCRA TSD Closure Plan	Within a geographic area's remedy that will be closed through HFFACO past practice processes and authorized through the Site-Wide Permit. As part of or separate from the past practice process, TSD closure plans may also be developed.	HFFACO Action Plan Section 6.1 and Site-Wide Permit Condition II.K.7.
	Past Practice	Inner Area Geographic Decision Unit	R-CPP or CPP Process	R-CPP or CPP	Within a geographic area remedy that will be closed through HFFACO past practice processes and authorized through the Site-Wide Permit (RPP) or CERCLA ROD (CPP)	HFFACO Action Plan Section 7; HFFACO Appendix C as updated through WIDS; Site-Wide Permit Condition II.Y.2
Not within probable effective edge of WMA or past practice cap or remedy	TSD	Inner Area Geographic Decision Unit	RPP or CPP Process and/or RCRA TSD Closure Plan	R-CPP or CPP RCRA TSD Closure Plan	Subject to remedy decisions developed through Central Plateau strategy; SST TSD component decisions cleanup actions through past practice process will be incorporated into the Site-Wide Permit. As part of or separate from the past practice process, TSD closure plans may also be developed	HFFACO Action Plan Section 6.1 and Site-Wide Permit Condition II.K.7.
	Past Practice	Inner Area Geographic Decision Unit	R-CPP or CPP Process	R-CPP or CPP Process	Subject to remedy decisions developed through Central Plateau inner area strategy; use of CPP process may require authorization through the Site-Wide Permit as well	HFFACO Action Plan Section 7; HFFACO Appendix C as updated through WIDS; Site-Wide Permit Condition II.Y.2

CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act of 1980
 HFFACO = Hanford Federal Facility Agreement and Consent Order
 R-CPP = RCRA past practice CAD/ROD SST = single-shell tank

CPP = CERCLA past practice
 RCRA = Resource Conservation and Recovery Act of 1976
 TSD = treatment, storage, or disposal

WMA = waste management area