



## U.S. Department of Energy Hanford Site

February 5, 2021

21-TF-000357

Mr. Jeffery J. Lyon, Tank Systems Operations  
and Closure Project Manager  
Nuclear Waste Program  
Washington State  
Department of Ecology  
3100 Port of Benton Blvd.  
Richland, Washington 99354

Dear Mr. Lyon:

U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION RESPONSE TO  
LETTER 20-NWP-154, "RE: WASTE MANAGEMENT AREA A/AX INTEGRATION  
STUDY OUTLINE"

- References:
1. Ecology, EPA, and DOE, 1989, *Hanford Federal Facility Agreement and Consent Order*, as amended, Washington State Department of Ecology, U.S. Environmental Protection Agency, and U.S. Department of Energy, Olympia, Washington, 89-10 Rev. 8, dated October 28, 2020.
  2. *Central Plateau Inner Area Cleanup Principles and Parameters*, U.S. Department of Energy, Richland, DOE/RL-2019-46, Rev. 0, dated October 20, 2020.
  3. Ecology letter from J. J. Lyon to B. T. Vance, ORP, "Re: Waste Management Area (WMA) A/AX Integration Study Outline," 20-NWP-154, dated September 10, 2020.

The U.S. Department of Energy (DOE) acknowledges Washington State Department of Ecology's (Ecology) letter (Reference 3) providing Ecology's minimum expectations for the Waste Management Area (WMA) A/AX Integration Study. DOE will consider that input as DOE develops the WMA A/AX Integration Study. However, the requirements for a WMA Integration Study have already been negotiated and agreed upon as part of Hanford Federal Facility Agreement and Consent Order (HFFACO) Action Plan Appendix I (Reference 1). As stated in HFFACO Milestone M-045-97, DOE will prepare an Integration Study as described in Section 2.1.1 of the HFFACO Action Plan. DOE is committed to meeting its obligations under the HFFACO.

In order to meet HFFACO Milestone M-045-97 by its due date, it will be necessary for DOE to continue development of the WMA A/AX Integration Study based on the agreed upon scope. The information required to complete many of the sections identified by Ecology for inclusion in the WMA A/AX Integration Study will not be available for inclusion in the WMA A/AX Integration Study, and in some cases will be addressed under their own HFFACO requirements.

For example, development of a conceptual site model for WMA A/AX has been underway as part of the Data Quality Objectives (DQO) process for RPP-RPT-60227, (*Data Quality Objectives for Vadose Zone Characterization at WMA A/AX*). Revision 2 of RPP-RPT-60227 is scheduled to be completed by September 30, 2021, and will support development of the WMA A/AX RCRA Facility Investigation/Corrective Measure Study (RFI/CMS) Work Plan. The WMA A/AX RFI/CMS Work Plan is due to be submitted to Ecology by September 30, 2022 (See HFFACO Milestone M-045-98).

DOE's ability to complete the DQO on schedule is being impacted, and this will likely impact DOE's ability to complete the WMA A/AX RFI/CMS Work Plan to meet HFFACO Milestone M-045-98. Delays in reaching agreement as to the boundary of WMA A/AX in the ongoing DQO negotiations are impacting DOE's ability to complete the DQO process for WMA A/AX. These delays, are caused by Ecology's proposal to expand the boundary of WMA A/AX. For example, Ecology's proposal to include a Double-Shell Tank, 241-AY-102 and an area outside the East fence line of WMA A/AX in the DQO process.

Another example is Ecology's requirement that information on specific retrieval technologies be provided in the WMA A/AX Integration Study. Retrieval approaches have not yet been developed for all WMA A/AX tanks and will not be included in the WMA A/AX Integration Study. Retrieval technologies to be deployed will be addressed through the Tank Waste Retrieval Work Plans development process specified in Section 2.1.3 of Appendix I of the HFFACO Action Plan.

A third example is Ecology's specification of cleanup levels and points of compliance under "Interface with 200 Area Groundwater Decisions and Remediation" in their annotated outline. A process for establishing cleanup levels and points of compliance has already been agreed upon among Ecology, U.S. Environmental Protection Agency, and DOE; and is documented in *Central Plateau Inner Area Cleanup Principles and Parameters* (Reference 2). Ecology specifying these cleanup levels and points of compliance in a proposed outline to the WMA A/AX Integration Study is not in keeping with this agreed upon process. DOE will follow that agreed upon process in establishing cleanup levels and points of compliance as is appropriate, rather than establishing them through the WMA A/AX Integration Study.

Please note that in Reference 2, Ecology incorrectly refers to an approval process for the WMA A/AX Integration Study. Figure I-1 of HFFACO Action Plan Appendix I clearly shows that regulatory approval of the Integration Study is not required. However, DOE will work with Ecology to finalize the WMA A/AX Integration Study through the process agreed upon for primary documents documented in Section 9.2.1 of the HFFACO Action Plan. That process includes requirements for both Ecology and DOE. DOE is committed to meeting their obligations under the process documented in Section 9.2.1 of the HFFACO Action Plan.

If you have any questions, please contact me, or your staff may contact Becky Blackwell, Closure Project Manager, Tank Farms Programs Division, Office of River Protection, on (509) 376-0058.

Sincerely,

**Brian A.  
Harkins**

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Brian A. Harkins, Deputy Assistant Manager  
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TF:RAL

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