

Department of Energy

Richland Operations Office P.O. Box 550 Richland, Washington 99352

20-AMRP-0004

NOV 0 6 2019

Ms. Alexandra K. Smith, Program Manager Nuclear Waste Program Washington State Department of Ecology 3100 Port of Benton Boulevard Richland, Washington 99354

Dear Ms. Smith:

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

In accordance with Section 9.2.1 of the Hanford Federal Facility Agreement and Consent Order, the U.S. Department of Energy Richland Operations Office (RL) is submitting the following three supplemental comment resolution activities, that have been agreed to by the Parties, to update previous document submittals and finalize Calendar Year 2014 Hanford Site Mixed Waste Land Disposal Restrictions Full Report, DOE/RL-2015-08, Revision 0 comment resolution process.

- Comment #175- P. B-34, Location Specific Data Sheet (LSDS), 221-T Tank System, Section 2.5; the following language will be deleted: "Refer to RL letter 01-RCA-192 for discussions on proposed management of this waste and the "Hanford Facility Dangerous Waste Permit Application, T Plant Complex," DOE/RL-95-36, Revision 1."
- Comment #176- P. B-36, LSDS, 221-T Tank System, Section 2.12; the following language will be deleted: "Negotiations on closure approach of the 221-T Resource Conservation and Recovery Act (RCRA) Tanks System have been accomplished with the Washington State Department of Ecology (Ecology) during the Part B workshop process. The disposition of the 221-T RCRA Tank System is documented in "Hanford Facility Dangerous Waste Permit Application, T Plant Complex, DOE/RL-95-36, Revision 1."
- Comment #190- P. B-101 and B-114, Treatability Group Data Sheet (TGDS), B Plant Cell 4 and B Plant Containment Building; modify text for B Plant Cell 4, Section 1.2 as follows: "Cell 4 waste resulted from the Waste Encapsulation and Storage Facility (WESF) hot cell maintenance waste (i.e., manipulator boots, light bulbs, high-efficiency particulate air [HEPA] filters, misc. debris). This waste is stored in accordance with interim status technical standards pending completion of RCRA closure. No additional waste will be stored in this location. B Plant has been retired from active operation and is in surveillance and maintenance mode pending final disposition, which will be addressed using the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

remedial action that is coordinated with RCRA closure;" and modify text for B Plant II 4 and B Plant Containment Building, Section's 4.3, to compliment Section 9.3.2, as follows: "A treatment technology has not been selected at this time. A technology assessment for the waste will be completed prior to selection of a treatment technology;" and modify text for B Plant Cell 4 and B Plant Containment Building, Section's 4.9 as follows: "B Plant waste is stored under interim status technical standards and managed in accordance with Section 8.0 of the Tri-Party Agreement Action Plan."

In support of finalizing Calendar Year 2014 Hanford Site Mixed Waste Land Disposal Restrictions Full Report, DOE/RL-2015-08, Revision 0 comment resolution process, as outlined in Section 9.2.1 of the Hanford Federal Facility Agreement and Consent Order, please see the attached Primary Document Statement for your signature.

If you have any questions, please contact me, or your staff may contact Mark French, of my staff, on (509) 373-9863.

Sincerely.

William F. Hamel, Assistant Manager

for the River and Plateau

AMRP:WFH

Attachment:

Primary Document Statement

cc: See page 3

cc w/attach:

S. G. Austin, CHPRC

J. Bell, NPT

O. L. Bostic, BNI

S. L. Brasher, MSA

R. Buck, Wanapum

C. J. Clement, MSA

L. Contreras, YN

S. W. Davis, MSA

D. R. Einan, EPA

M. D. Ellefson, PNNL

K. A. Elsethagen, Ecology

L. D. Habel, CHPRC

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J. A. Joyner, WRPS

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J. B. Price, Ecology

S. N. Schleif, Ecology

E. Soto, Ecology

L. R. Strickling, MSA

W. E. Toebe, CHPRC

M. B. Wilson, MSA

Administrative Record (M-026-01Y, M-026-01)

Environmental Portal

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*.

A d and iggrad this	= th	day of Nous	2019.
Approved and issued this	9	day of Nous	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 U.S. Department of Energy, Office of River Protection