



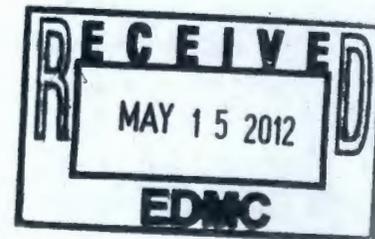
STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 8, 2012

12-NWP-071

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



Re: Proposed Changes to RPP-PLAN-39114 and RPP-PLAN-38777

Dear Mr. Kemp:

The Department of Ecology (Ecology) has reviewed the proposed changes for both the *Phase 2 Resource Conservation and Recovery Act (RCRA) Facility Investigation/Corrective Measures Study (RFI/CMS) Work Plan for Waste Management Area C (RPP-PLAN-39114)* and the *Sample and Analysis Plan for Phase 2 Characterization of Vadose Zone in Waste Management Area C (RPP-PLAN-38777)*. We approve the proposed changes in both documents. The information obtained from these RFI/CMS activities is important in the completion of the Waste Management Area (WMA) C Performance Assessment.

Ecology appreciates the cooperative and collaborative development for these documents. However, we remain concerned that the United States Department of Energy (USDOE) has suspended the discussions on development of the RFI/CMS Report identified in Milestone M-045-61, which is due 12/31/2014. Continuing that collaboration, to ensure that the agencies are in agreement on content, would provide a more efficient review period. Our hope is to be able to respond and resolve comments in a timely manner so that we can support Hanford Federal Facility Agreement and Consent Order Milestones, M-045-62, "Submit a Phase 2 Corrective Measures Implementation Plan for WMA-C", due 06/30/2015 and M-045-82, "Submit a permit modification to support final closure requirements for WMA-C", due 9/30/2015.

Ecology acknowledges that the field work and laboratory analysis work for the RFI/CMS has been stopped and some analytical activities were left incomplete. We want to emphasize the importance of completing the validation, documentation, and evaluation of the field work data (RPP-39114, Section 5). We strongly urge its completion. These efforts will enable all parties to understand the purpose and importance of the remaining work that is planned (RPP-39114, Section 4.5).

Ecology anticipates that the following actions are necessary to support the completion of the RCRA RFI/CMS Study work:

- 1) USDOE Office of River Protection (ORP) will release a final revision of these two documents as approved
- 2) Complete work identified in work plan



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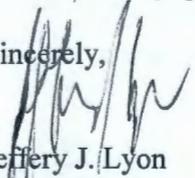
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- 3) Provide the date for submittal and completion of:
 - a) The validation, documentation, and evaluation of the analytical data from FY2010 and FY2011
 - b) The following reports:
 - i) Tc-99 laboratory interferences
 - ii) Evaluation of the organic detects in WMA C groundwater wells
 - iii) Latest trending of groundwater contaminants at WMA C groundwater wells
 - iv) Evaluation of the Quality Assurance/Quality Control and holding time issues associated with the 222-S shutdown in summer of 2011
- 4) Submit the revised *Hanford C-Farm Leak Assessment Report* (RPP-ENV-33418)

With the completion of these actions, USDOE-ORP and Ecology can discuss the information and agree to any needed changes or actions to complete the field work, or determine that USDOE-ORP has completed the necessary field work for the work plan. These actions will allow for immediate and final implementation of the work plan when available funding can be obtained to support Milestone M-045-61, which is due 12/31/2014.

If there are any questions, please contact Michael Barnes at 509-372-7927.

Sincerely,


Jeffery J. Lyon
Project Manager
Tank System Operations and Closure

mb/dbm

cc:

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Administrative Record: Tank Waste Storage M-45-101
Environmental Portal
USDOE-ORP Correspondence Control
WRPS Correspondence Control