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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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May 2, 2016

16-NWP-080

Mr. Ray J. Corey, Assistant Manager of River and Plateau  
Richland Operations Office  
United States Department of Energy  
PO Box 550, MSIN: A5-11  
Richland, Washington 99352

Re: Department of Ecology's (Ecology) Comments on the *200-SW-2 Radioactive Landfills Group Operable Unit RCRA Facility Investigation/Corrective Measures Study/Remedial Investigation/Feasibility Study Work Plan*, DOE/RL-2004-60, Draft B

Dear Mr. Corey:

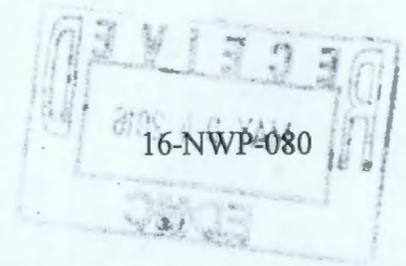
On March 31, 2015, Ecology received the *200-SW-2 Radioactive Landfills Group Operable Unit RCRA Facility Investigation/Corrective Measures Study/Remedial Investigation/ Feasibility Study Work Plan*, DOE/RL-2004-60, Draft B (Work Plan) for review and comment. Ecology submitted comments to the U. S. Department of Energy – Richland Operations Office (USDOE-RL), and the reconciliation process for those comments has been finished.

In a letter dated September 24, 2015, the Confederated Tribes and Bands of the Yakama Nation also submitted comments on this Work Plan to USDOE-RL. Ecology and Yakama Nation staff have discussed these comments. Based on these discussions, a list of comments is included below that Ecology believes would improve the Work Plan and clarify some information. These comments should be taken into consideration and acted on appropriately.

1. [Sections 3.8-3.10] The purpose of the Remedial Action Objectives (RAOs) is to explain and address site risks and to include an action to be taken to achieve the objective. For each of the identified RAOs, please describe the action to be taken in order to achieve the objective.
2. [Table 3-6] Soil gas has been detected in many landfills, and the Work Plan describes further investigation. Table 3-6, should, therefore, contain technology for potential remediation of soil gas in the landfills.
3. [Section 5.12.4] The section on Treatment, Storage, and Disposal (TSD) Closure Plans is too abbreviated and does not describe the regulatory process. A suggested rewrite should clearly state:
  - a. Closure plans for TSDs are necessary for integration. This authority comes from the Site-wide permit, not the Remedial Investigation/Feasibility Study.
  - b. The intent of the Tri-Parties' CERCLA remediation at the Hanford Site is to fulfill the corrective action requirements for past practice units remediated under CERCLA authority. Include citation referencing Permit Condition II.Y.1 in the text discussion.



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4. [Chapter 6] Ecology agrees with the Yakama Nation's request that the Project Schedule be edited to describe an accurate detailed schedule that includes interim and final due dates.
5. [Chapter 7] Ecology agrees with the Yakama Nation's request that language be inserted in Section 7.2 or elsewhere, where appropriate. This language should describe any changes to the Sampling and Analysis Plan which will impact permit closure and corrective action will be available for public review through the permit modification process.
6. [Section J8.1.2] This section refers to the Soil and Groundwater Remediation Project's Quality Assurance/Quality Control which is not described in the Work Plan. Ecology would recommend referencing the actual Quality Assurance Project Plan that is described in the Sampling and Analysis Plan in Section A6.

If there are any questions, please contact me at [deborah.singleton@ecy.wa.gov](mailto:deborah.singleton@ecy.wa.gov) or (509) 372-7923, or Elis Eberlein, Chemist, at [elis.eberlein@ecy.wa.gov](mailto:elis.eberlein@ecy.wa.gov) or (509) 372-7906.

Sincerely,

Deborah Singleton  
Waste Management Project Manager  
Nuclear Waste Program

ee/jvs

cc electronic:

Dave Bartus, USEPA  
Dennis Faulk, USEPA  
Doug Hildebrand, USDOE  
Roberta Day, USDOE  
Ken Niles, ODOE  
Elis Eberlein, Ecology  
John Price, Ecology  
Deborah Singleton, Ecology  
Ron Skinnarland, Ecology  
Environmental Portal  
Hanford Facility Operating Record  
USDOE-RL Correspondence Control

cc:

Rod Skeen, CTUIR  
Gabriel Bohnee, NPT  
Alyssa Buck, Wanapum  
Russell Jim, YN  
Steve Hudson HAB  
Administrative Record  
NWP Central File  
NWP Reader File