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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 27th, 2013

13-NWP-070

Mr. Matthew S. McCormick
United States Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352

Re: 2012 Hanford Site Mixed Waste Land Disposal Restriction (LDR) Summary Report
DOE/RL-2012-12 Rev 0

1213180

Dear Mr. McCormick:

The Department of Ecology (Ecology) has received and reviewed the Calendar Year 2012 Hanford Site Mixed Waste LDR Summary Report. Please find enclosed Ecology's comments. Ecology appreciates the efforts of United States Department of Energy in preparing this report and looks forward to your responses to our questions and concerns within the next 45 days. If you have any questions, please contact me at deborahsingleton@ecy.wa.org or (509) 372-7923.

Sincerely,

Deborah Singleton
Waste Management Section Project Manager
Nuclear Waste Program

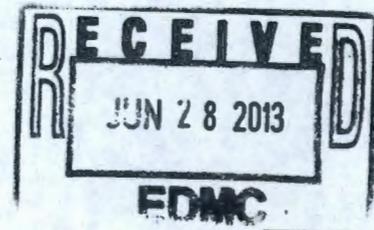
ac/jvs

Enclosure

cc:

Dennis Faulk, EPA
Larry Romine, USDOE
Mike Collins, USDOE
Robert Piippo, MSA
Stuart Harris, CTUIR
Gabriel Bohnee, NPT

Russell Jim, YN
Steve Hudson, HAB
Ken Niles, ODOE
Administrative Record
Environmental Portal
Correspondence Control, USDOE-RL

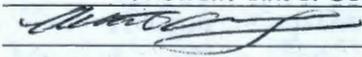


Washington State Department of Ecology
REVIEW COMMENT RECORD (RCR)

1. Date **June 25, 2012** 2. Review No.0
 3. Project No. 4. Page 1 of 3
 LDR

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|--|---|---|-----------------------------------|--------------------------------|
| 5. Document Number(s)/Title(s) 2012 Hanford Site Mixed Waste LDR Summary Rpt. DOE/RL-2012-12 Rev 0 | 6. Program/Project/Building Number NWP/Waste Management/RFO | 7. Reviewer Chang, Singleton, Lyon, Price, McDonald, Lowe, et al. | 8. Organization/Group Ecology/NWP | 9. Location/Phone RFO/372-7890 |
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| 17. Comment Submittal Approval: | 10. Agreement with indicated comment disposition(s) | 11. CLOSED |
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| Date | Organization Manager (Optional) | Date | Reviewer/Point of Contact | Date | Reviewer/Point of Contact |
| | | |  | | |
| | | | Author/Originator | | Author/Originator |

| Item | Location in Document | Comment | Hold Point | Disposition (Provide justification if NOT accepted.) | Status |
|------|---|--|------------|--|--------|
| 1 | Table 3-1, page 3-2 & Table 3-1, page 3-3 | In DST waste row and SST row – milestones M-050, M-051, and M-061 are listed as reference milestones. Are these three milestones still in the HFFACO? Have they not been deleted? | | | |
| 2 | Table 4.1, page 4-3 | In DST waste row – milestones M-050, M-051, and M-061 are listed as reference milestones. Are these three milestones still in the HFFACO? Have they not been deleted? | | | |
| 3 | Table 1-5 | Per response #6 in 13-AMRP-0001, modify text in Table 1-5 as follows: Replace “Rail cars were dispositioned at either ERDF or the B-Reactor Museum” with “Rail cars were declared waste and disposed in ERDF, except 4 railcars were sent to B Reactor as “reusable equipment” not waste as they are being used as displays.” | | | |
| 4 | Table 1-4, page 1-34 | Why is the 702-A Ventilation Building seal pot’s heel thought to not contain dangerous waste. Ammonia, NOx, and SOx vapors can all condense and render mixed waste accruals after years of operation and other seal pots in the SST and DST systems contain heels that are considered mixed waste. Sampling should be conducted or the facility should be presumed to contain mixed waste and closed per the requirements of the other ancillary equipment entries listed. | | | |

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REVIEW COMMENT RECORD (RCR)**

1. Date **June 25, 2012** 2. Review No.0

3. Project No.
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|----|-----------|---|--|--|--|
| 12 | Table 1-1 | The Current Inventory shown in Table 1-1 for the 221-T Containment Building is 58 m3 as of December 2012. However, the inventory for all of T Plant as reported at the January 2013 SWOC PMM meeting was 49 m3. Please explain the difference. | | | |
| 13 | Table 1-1 | For the several categories of mixed waste identified in Table 1-1 as MLLW-01 to MLLW-10, and TRUM-CH and TRUM-RH, it is not readily apparent where these wastes are being stored. | | | |
| 14 | General | The Current Inventory of TRUM-CH Large/Small Containers would seem to include some waste that is retrievably stored but not yet retrieved, correct? This is based on comparing the total for these categories in the LDR Report to the volume for all the SWOC units as reported in the January 2013 SWOC PMM. | | | |
| 15 | Table 1-4 | Table 1-4 identifies a tank in Cell 11-L which contains 500 gallons of dangerous waste. This tank was previously sampled and reported in an LDR Assessment that was discussed in the T Plant PMM on July 24, 2008. The 11-L tank is not included with the other T Plant tank systems in the sitewide DW permit. Should it be? It is unclear if the tank is being regularly monitored. The text refers to a data gap plan and TPA negotiations, and says "...discussed with Ecology during the T Plant Complex Dangerous Waste Permit Part A and Part B negotiations" yet the tank doesn't appear in the submittals to date. | | | |
| 16 | Table 1-4 | Would like some further explanation of the PMW in Table 1-4. Are the listings current as of the end of CY 2012? For example, the 340 Vault Tanks may have been removed last year. The 340 waste heels and clean out residues would most certainly designate as mixed waste as the tanks contained (among other things) lab waste from analysis of tank farm samples. Why would this be "potential" mixed waste? | | | |
| 17 | Table 5-1 | In Table 5-1 for the T Plant Complex location, the 2706-T Tank System is shown with 0.540 m3 of waste in 2 tanks. If this is referring to the 220 and 221 tanks in the 2706-TB building, those tanks are empty and have been blanked off. | | | |
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