



**Confederated Tribes and Bands  
of the Yakama Nation**

1245601  
(0068932H)

Established by the  
Treaty of June 9, 1855

August 15, 2017

Mr. Joe Franco, Assistant Manager for the River and Plateau  
Richland Operations Office  
United States Department of Energy  
P. O. Box 550  
Richland, WA 99352

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

Mr. Dennis Faulk  
United States Environmental Protection Agency, Region 10  
309 Bradley Blvd., Suite 115  
Mail Code: HPO  
Richland, Washington 99352

Subject: Review of the Removal Action Work Plan for the 200-BP-5 Operable Unit Groundwater  
Extraction, DOE/RL-2017-11, Draft A

Dear Ms. Smith, Mr. Franco and Mr. Faulk:

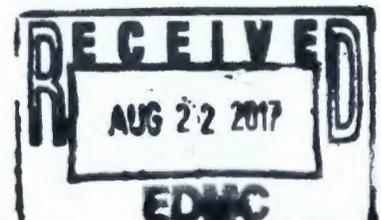
The Yakama Nation (YN) ER/WM Program appreciates the opportunity to review and provide  
comments on the Removal Action Work Plan for the 200-BP-5 Operable Unit Groundwater Extraction.

The Confederated Tribes and Bands of the Yakama Nation is a federally recognized sovereign pursuant  
to the Treaty of June 9, 1855 (Treaty) made with the United States of America (12 Stat. 951). The U.S.  
Department of Energy's (DOE) Hanford site was developed on ceded land by the Yakama Nation under  
the Treaty with the United States. The Yakama Nation retains reserved rights to this land under the  
Treaty.

The YN ER/WM Program supports the removal of contaminated groundwater from the B Complex.  
The contaminants of concern are uranium, technetium-99 (Tc-99), iodine-129 (I-129), tritium, nitrates  
and cyanide. The work plans states these contaminants are currently or have been above the drinking  
water standard (DWS). Groundwater contaminants, especially those above the (DWS), are of a major  
concern to the YN.

Our review of this document identified several areas of concern to the YN. These are:

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H-0-6

1. Only uranium, Tc-99, and nitrates are being removed from the groundwater at the 200 West Area Pump-and-Treat Facility. Tritium, I-129 and cyanide are not being treated. Not removing cyanide from groundwater through available methods is a concern.
2. This work plans states (page 4, paragraph 2), "There is no treatment method for tritium or I-129." This is not a true statement. There is treatment for I-129 through an ion exchange process. I-129, a very long-lived radionuclide, is found in one of the largest contaminated groundwater plumes at Hanford. Returning I-129 to the groundwater is a concern.
3. The work plan states several times that the tritium, I-129 and cyanide will not be treated, but re-injected back into the soil following "blending." It appears blending is another term for dilution. In order to allow for re-injection of these contaminants they must be below cleanup limits or the DWS. Since they are not being removed, reinjection requires blending, or simply put dilution. Diluting these contaminants does not reduce the quantity of contaminants removed from the B Complex; it simply reduces the concentrations to allow for reinjection. The quantity of tritium, I-129, and cyanide removed from the B Complex is simply re-injected back into the soil. Blending is a concern.

The ER/WM Program would like to meet with DOE to address the areas of concern listed above. We especially want to discuss the reinjection of contaminants back into the soils, a practice that is done at all Hanford Pump-and-Treat Facilities. The contaminants were deliberately discharged into the soils at Hanford creating human health and environmental risks. Simply removing them from one location and placing them into another does not reduce the risk, especially from long-lived radionuclides.

The Yakama Nation looks forward to dialog on these concerns. If you have any questions please contact Rose Longoria (509) 452-2502, or Dave Rowland (509) 582-3466 or (509) 945-4488.

Sincerely,



Dave Rowland  
Yakama Nation  
ER/WM Chemical Engineer

Cc: Doug Shoop, USDOE/RL  
RHW Committee  
G. Bohnee, NPT  
R. Skeen, CTUIR  
K. Niles, ORDOE  
Administrative Record

## Corrigan, Michelle B

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**From:** Noonan, Carolyn P  
**Sent:** Tuesday, August 22, 2017 12:42 PM  
**To:** ^Administrative Record  
**Subject:** FW: TPA Administrative Record

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Regarding the YN letter you sent over this morning, please publish to IDMS and to the external AR. Let me know if you have questions, and thanks for your diligence with these HNRTC documents.

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**From:** Clark, Clifford E (Cliff)  
**Sent:** Tuesday, August 22, 2017 12:41 PM  
**To:** Noonan, Carolyn P <Carolyn\_P\_Noonan@rl.gov>  
**Subject:** RE: TPA Administrative Record

Carolyn,

Your interpretation of our discussion is correct. These comments are directly related to a decision that will be made by DOE, the lead federal agency under CERCLA. Thus the letter is part of the background information DOE will use to assist in making its decision.

Cliff

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**From:** Noonan, Carolyn P  
**Sent:** Tuesday, August 22, 2017 11:32 AM  
**To:** Clark, Clifford E (Cliff) <cliff.clark@rl.doe.gov>  
**Subject:** FW: TPA Administrative Record

Hi Cliff,

One more letter for review. The subject is the YN's comments on DOE/RL-2017-11, and Franco is addressed, as well as Smith and Faulk. Following your logic from our discussion yesterday, I'd assume that this record WOULD be included in the administrative record. Please advise at your earliest convenience.

Thank you,  
Carolyn

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**From:** ^Administrative Record  
**Sent:** Tuesday, August 22, 2017 11:20 AM  
**To:** Noonan, Carolyn P <Carolyn\_P\_Noonan@rl.gov>  
**Cc:** Childers, Heather M <Heather\_M\_Childers@rl.gov>; Piippo, Robert E <Robert\_E\_Piippo@rl.gov>  
**Subject:** RE: TPA Administrative Record

Carolyn,

Good morning! I just wanted to let you know that we received another letter from the Yakama Nation this morning (see attached PDF). I assume that you'd like us to handle this letter in the same way you instructed us to handle the two letters from before, but I'd still like to double check.

Not sure as to the reason why, but it looks as if we may be receiving more letters from the Yakama Nation in the future, I suppose?

Sincerely,

*Michelle Corrigan*

Administrative Records  
2440 STVCN Room 1101  
(509) 376-9000

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**From:** Noonan, Carolyn P  
**Sent:** Monday, August 21, 2017 12:52 PM  
**To:** ^Administrative Record <[ADMINREC@rl.gov](mailto:ADMINREC@rl.gov)>  
**Cc:** Clark, Clifford E (Cliff) <[cliff.clark@rl.doe.gov](mailto:cliff.clark@rl.doe.gov)>; Childers, Heather M <[Heather\\_M\\_Childers@rl.gov](mailto:Heather_M_Childers@rl.gov)>; Piippo, Robert E <[Robert\\_E\\_Piippo@rl.gov](mailto:Robert_E_Piippo@rl.gov)>  
**Subject:** FW: TPA Administrative Record

Hi Heather,

I spoke with Cliff, who advised that we publish the documents to IDMS to maintain it as an official record, but not publish it to the external website.

This is based on my understanding (and please correct me if I'm wrong) that publishing documents to the AR involves two steps: (1) publishing to IDMS to create electronic record; and (2) pushing the file to the external server.

Please advise if I've misunderstood this process, or if you have questions.

Thank you,

Carolyn

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**From:** Noonan, Carolyn P  
**Sent:** Thursday, August 17, 2017 8:31 AM  
**To:** Clark, Clifford E (Cliff) <[cliff.clark@rl.doe.gov](mailto:cliff.clark@rl.doe.gov)>  
**Cc:** McKarns, Anthony C (Tony) <[tony.mckarns@rl.doe.gov](mailto:tony.mckarns@rl.doe.gov)>; ^Administrative Record <[ADMINREC@rl.gov](mailto:ADMINREC@rl.gov)>  
**Subject:** FW: TPA Administrative Record

Hi Cliff,

The AR gals recently received two letters from the Yakama Nation. The first has to do with the Nation's support of Heart of America funding. The second is the Nation's commentary on the Class 2 permit mod for 1301-N and 1325-N. The clerks were unsure whether or not they should add them to the AR because of some previous guidance. I believe, per your email below, that the clerks should indeed process the letters into the Administrative Record.

Thank you,

Carolyn

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**From:** Piippo, Robert E  
**Sent:** Monday, April 25, 2016 7:21 AM  
**To:** Clark, Clifford E (Cliff) <[cliff.clark@rl.doe.gov](mailto:cliff.clark@rl.doe.gov)>; Wisness, Steven H <[steven.wisness@rl.doe.gov](mailto:steven.wisness@rl.doe.gov)>  
**Cc:** Post, Thomas C <[thomas.post@rl.doe.gov](mailto:thomas.post@rl.doe.gov)>; Noonan, Carolyn P <[Carolyn\\_P\\_Noonan@rl.gov](mailto:Carolyn_P_Noonan@rl.gov)>; Serrano, Simon P <[Simon.Serrano@rl.doe.gov](mailto:Simon.Serrano@rl.doe.gov)>; Frey, Jeffrey A <[jeffrey.frey@rl.doe.gov](mailto:jeffrey.frey@rl.doe.gov)>; MacAlister, Edward D (Ed) <[edward.macalister@rl.doe.gov](mailto:edward.macalister@rl.doe.gov)>; Wright, Allison K <[allison.wright@rl.doe.gov](mailto:allison.wright@rl.doe.gov)>; Piippo, Robert E <[Robert\\_E\\_Piippo@rl.gov](mailto:Robert_E_Piippo@rl.gov)>  
**Subject:** RE: TPA Administrative Record

Thanks Cliff,

we will get the letters into the AR ASAP.

Rob

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**From:** Clark, Clifford E (Cliff)  
**Sent:** Thursday, April 21, 2016 1:44 PM  
**To:** Piippo, Robert E ; Wisness, Steven H  
**Cc:** Post, Thomas C ; Noonan, Carolyn P ; Serrano, Simon P ; Frey, Jeffrey A ; MacAlister, Edward D (Ed) ; Wright, Allison K  
**Subject:** RE: TPA Administrative Record

Rob,

The work performed by the HNRTC is directly related to the selection of remedies for all of the CERCLA decision documents. The funding is provided through the CERCLA grant to the Ecology Nuclear Waste Program. So, the work being performed by the HNRTC is directly and specifically related to the development of the Remedial Investigations, Feasibility Studies, and the follow Records of Decisions on and Proposed Plans. It is not limited to any one of the contractors since the information provided by the NHNRTC is used by all. It is a minor element of the cost of performing the CERCLA work at Hanford and belongs in the CERCLA administrative record that MSA is contracted to maintain for DOE. I would hope that MSA has a generic charge code for cross-cutting CERCLA work.

*Clifford F. Clark*  
Environmental Team Lead  
Environmental, Safety & Quality Division  
U.S. Department of Energy Richland Operations Office  
Phone: (509) 376-9333 Cell: (509) 713-9445  
E Mail: [cliff.clark@rl.doe.gov](mailto:cliff.clark@rl.doe.gov)

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**From:** Piippo, Robert E  
**Sent:** Thursday, April 21, 2016 1:24 PM  
**To:** Wisness, Steven H <[steven.wisness@rl.doe.gov](mailto:steven.wisness@rl.doe.gov)>  
**Cc:** Clark, Clifford E (Cliff) <[cliff.clark@rl.doe.gov](mailto:cliff.clark@rl.doe.gov)>; Post, Thomas C <[thomas.post@rl.doe.gov](mailto:thomas.post@rl.doe.gov)>; Noonan, Carolyn P

<Carolyn\_P\_Noonan@rl.gov>; Piippo, Robert E <Robert\_E\_Piippo@rl.gov>

**Subject:** RE: TPA Administrative Record

Steve,

just so were clear, per CERCLA AR guidance and the TPA list of AR docs, HNRTC budget letters do not exist in either requirements to go into an AR. On the list provided from legal B. Williams/P. Serrano as to what should go into an AR index to support legal challenges to cleanup (what documents supported a ROD) no HNRTC budget letters were listed by legal.

It is assumed that the letters are already in IDMS for internal viewing, the AR will provide public viewing.

If you still need them to go into the AR, what project/contractor do I charge (CHPRC, WCH, WRPS) to have them placed into the AR?

Any questions let me know.

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**From:** Wisness, Steven H

**Sent:** Thursday, April 21, 2016 10:32 AM

**To:** Piippo, Robert E <Robert\_E\_Piippo@rl.gov>

**Cc:** Clark, Clifford E (Cliff) <cliff.clark@rl.doe.gov>; Post, Thomas C <thomas.post@rl.doe.gov>

**Subject:** TPA Administrative Record

Hi Rob,

I talked to Cliff Clark about 4 letters (attached) that need to go into the TPA administrative record (AR) and he agrees. DOE is required to send these letters per a legal settlement agreement. These letters and their inclusion in the TPA AR demonstrate compliance with that agreement. Your assistance in placing these in the AR is greatly appreciated. Please let me know if you need any further information.

Thanks,

***Steve Wisness***

*Longenecker and Associates*

Contractor Support to DOE

Richland Operations Office

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