



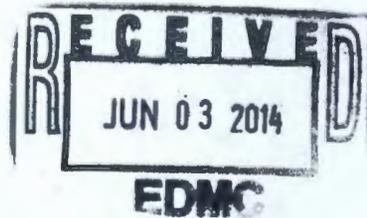
STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 29, 2014

14-NWP-112 – Reissue

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



Re: *Calendar Year 2013 Hanford Site Mixed Waste Land Disposal Restrictions (LDR) Summary Report, DOE/RL-2014-17, Revision 0*

Dear Mr. Corey:

This letter was originally issued under letter number 14-NWP-108; the correct letter number is 14-NWP-112.

The Department of Ecology (Ecology) reviewed the referenced LDR report submitted by the United States Department of Energy (USDOE). Ecology appreciates that USDOE prepared this report. Enclosed are Ecology's comments, and we look forward to your responses to our comments within 45 calendar days.

Ecology intends to begin discussion with USDOE in the late summer or early fall, regarding details of the content of Calendar Year 2014 LDR report. The discussion is to ensure that the LDR report fulfills all the regulatory needs and requirements for USDOE and Ecology. The complete LDR report is required in the year 2015 in order to fulfill Milestone M-026-01Y.

If you have any questions regarding this letter, please contact me at Deborah.Singleton@ecy.wa.gov or (509) 372-7923.

Sincerely,

Deborah Singleton
Waste Management Project Manager
Nuclear Waste Program

ee/aa
Enclosure

cc: See page 2

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Mr. Ray J. Corey
May 29, 2014
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14-NWP-112 – Reissue

cc electronic w/enc:

- Dennis Faulk, EPA
- Jon Perry, MSA
- Elis Eberlein, Ecology
- USDOE-RL Correspondence Control

cc w/enc:

- Mike Collins, USDOE
- Al Farabee, USDOE
- Thomas Fletcher, USDOE
- Rob Piippo, MSA
- Lana Strickling, MSA
- Harold Tilden, PNNL
- Stuart Harris, CTUIR
- Gabriel Bohnee, NPT
- Lela Buck, Wanapum
- Russell Jim, YN
- Steve Hudson, HAB
- Ken Niles, ODOE
- Administrative Record: LDR**
- Environmental Portal
- Hanford Operating Record General File

**Washington State Department of Ecology
REVIEW COMMENT RECORD (RCR)**

1. Date **May 25, 2014** 2. Review No.0

3. Project LDR Report 4. Page 1 of 2

5. Document Number(s)/Title(s): 2013 Hanford Site Mixed waste LDR Summary Rpt. DOE/RL-2014-17 Rev 0	6. Program/Project: NWP/Waste Management/RFO	7. Reviewer: Eberlein, Singleton, Lyon, McDonald, Bond, Boyd, Welsh et al.	8. Organization/Group: Ecology/NWP	9. Location/Phone: RFO/372-7923
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Item	Location in Document	Comment	Hold Point	Disposition (Provide justification if NOT accepted.)	Status
1	Section 1.0, p. 1-1 and other locations	This section introduces the requirement for this report under Milestone M-26-01. The milestone is really correctly named M-026-01. It is also incorrect on p. 2-1, but correctly written on p. 1-3 and p. 5-1. M-91-03 on p. 1-4 is also incorrect. Please verify and correct the milestone nomenclature throughout the report.			
2	Section 1.2, p. 1-4	The first paragraph in Section 1.2 has a sentence that reads: "Data on waste volumes in these tables are reported from the database." What database is this?			
3	Table 1-1, p. 1-6	The Current Inventory shown in Table 1-1 for the 221-T Containment Building is 58 m3 as of December 2013. However, the inventory for all of T Plant as reported at the January 2014 SWOC PMM meeting was 48 m3. Please explain the difference.			
4	Table 1-1, p. 1-7	Why are only 33 cubic meters of waste generated each year for the DSTs until 2015 and then 23 cubic meters each year starting in year 2016...especially when no waste is generated by the SSTs at all?			
5	Table 1-1, p. 1-7	Is mixed waste being generated by the ongoing retrieval of SST waste and DST operations (e.g., PPE, failed equipment, waste transfer hoses being replaced, etc.)? These activities are subject to the DW permit. Is this the waste that is reported as projected DST waste in Table 1-1 (p.1-7)?			

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3. Project
LDR Report 4. Page 2 of 2

6	Table 1-4, p. 1-31	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.			
7	Table 1-4, p. 1-33	Why is the 702-A Ventilation Building's 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.			
8	Table 4-1, p. 4-2	The dates listed in the table for the 221-T Containment Building and 221-T Tank Systems will need to be identified as guidelines for when closure will begin at the T Plant facility. Those dates shall be included in the closure plans submitted as part of meeting the requirements for a Compliance Agreement and Final Order with EPA Region 10.			