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05-AMCP-0318

JUL 12 2005

Mr. Michael A. Wilson, Program Manager
 Nuclear Waste Program
 State of Washington
 Department of Ecology
 3100 Port of Benton Boulevard
 Richland, Washington 99354

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EDMC

Dear Mr. Wilson:

CALENDAR YEAR 2004 LAND DISPOSAL RESTRICTIONS REPORT COMMENT RESPONSES

The purpose of this letter is to respond to a June 9, 2005, letter from E. Van Mason to K. A. Klein and R. J. Schepens, "United States Department of Energy's Calendar Year (CY) 2004 Land Disposal Restrictions (LDR) Report, Submitted in Accordance with Milestone M-26-010." 65372

In accordance with the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), Action Plan, Section 9.0, Documentation and Records, enclosed are the responses to the State of Washington Department of Ecology (Ecology) comments for the CY 2004 Hanford Site Mixed Waste Land Disposal Restrictions Report (DOE/RL-2005-23) (CY 2004 LDR Report). The proposed approach and responses to Ecology's comments were agreed to at the June 21, 2005, Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Project Managers meeting with Eric Van Mason and Debra Singleton, of your staff. 64670

To formalize this agreement, the U.S. Department of Energy, Richland Operations Office requests that Ecology sign the signature page contained in the CY 2004 LDR Report that was submitted April 28, 2005.

If you have questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,

Keith A. Klein
 Manager

AMCP:GLS

Enclosure

cc: See page 2

cc w/encl:

G. Bohnee, NPT

N. Ceto, EPA

J. D. Doughty, CHG

L. L. Fritz, FHI

S. Harris, CTUIR

J. S. Hertz, FHI

R. Jim, YN

A. G. Miskho, FHI

E. J. Murphy-Fitch, FHI

K. Niles, ODOE

D. Singleton, Ecology

H. T. Tilden, PNNL

E. Van Mason, Ecology

D. M. Yasek, BHI

Administrative Record M-026

Environmental Portal

U.S. Department of Energy responses to
State of Washington, Department of Ecology's Comments
on the CY2004 Hanford Site Mixed Waste Land Disposal Restrictions Report
(DOE/RL-2005-23), Milestone M-26-01O

Comment #1: Page 2-9, Table 2-2 *Treatability Group Summary of Storage, Characterization, Treatment, and Disposal Activities* 241-CX Tank System: This table lists the current stored inventory of the 241-CX tank system as 3.0 m³. This number is supposed to reflect the volume of waste stored in tank 241-CX-72. However, the total volume for the treatability group remains unconfirmed. Although a complete designation of the waste in tank 241-CX-71 was not performed, a state-only waste designation for cyanides was confirmed. The volume of waste in this tank would ideally be included in the total treatability group inventory number but the volume of this waste is also unknown. A footnote should be added to clarify the uncertainty in volume of the total inventory number for the 241-CX treatability group.

USDOE Response: A footnote will be added to the 241-CX Tank System entry in Table 2-2 that states: "The stored volume reported contains uncertainty as to the actual volume." The footnote will be added in the CY2005 LDR Report. The waste designation and the status of the 3 tanks within the 241-CX Tank System will be evaluated, as well as other factors important to Ecology, during the upcoming LDR storage assessment.

Comment #2: Page 5-1, 5.0 Waste Releases From Storage Units: Second sentence states, "The only waste releases from storage to the environment have occurred from the SST System." Sentence should be revised to say, "The only *known* waste releases from storage to the environment have occurred from the SST System."

USDOE Response: The word "known" will be added to the sentence in the CY 2005 LDR Report.

Comment #3: Page 14-3, Table 14-1 Summary of Treatment Information for Each Treatability Group 241-CX Tank System: *See comment 1.* Please provide a footnote to clarify that there is uncertainty in this stored wastes inventory number for the 241-CX Tank System.

USDOE Response: A footnote will be added to the 241-CX Tank System entry in Table 14-1 that states: "The stored volume reported contains uncertainty as to the actual volume." The footnote will be added in the CY 2005 LDR Report.

Comment #4: Pages 14-4, 14-5 Table 14-1 Summary of Treatment Information for Each Treatability Group MLLW-07 TRUM-Large Box TRUM-RH: The treatment process listed for treatability group MLLW-07 is M-091 MLLW and the treatment process listed for treatability groups TRUM – Large Box and TRUM Large Box is M-091 TRUM. Please indicate that these refer to milestones to treat waste for which a treatment process has yet to be determined.

USDOE Response: The text in the table cells will be replaced with the following phrase: "To be determined through M-091 milestone implementation." This change will occur in Table 14-1 and in Table 2-2 in the CY2005 LDR Report.

Comment #5: Page B-61 241-CX Tank System TGDS and LSDS: Please provide information within the data sheets regarding the uncertainty of waste volume and designation for the 241-CX-Tank System treatability group.

USDOE Response: Text will be added in Section 2.3 of the LSDS, “comments on waste inventory” to state: “The stored volume reported contains uncertainty as to the actual volume.” The text will be added in the CY2005 LDR Report.

Comment #6: Page 9-11, 9.1.9 Waste That Currently Meets Disposal Requirements: This section states, “Based on an agreement with Ecology on February 6, 2003, waste that is directly disposed is excluded from the LDR report.” Please provide a reference to this agreement within the LDR report.

RL Response: The reference to the February 6, 2003 LDR Project Manager Meeting minutes will be added to Section 16, References, in the CY2005 LDR Report