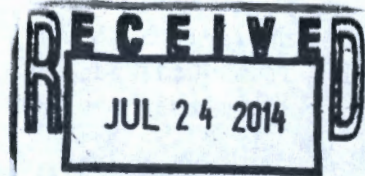




STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

July 21, 2014



14-NWP-147

Mr. Thomas W. Fletcher, Assistant Manager for  
Tank Farms Project  
Office of River Protection  
United States Department of Energy  
PO Box 450, MSIN: H6-60  
Richland, Washington 99352

Mr. L. David Olson, President and  
Project Manager  
Washington River Protection Solutions  
PO Box 850, MSIN: H6-63  
Richland, Washington 99352

Re: E-mail, dated June 11, 2014, from Jeffrey J. Vanderpol for a Request for Extension "HIHTL Removal Date Extension Approval Language"

Dear Mr. Fletcher and Mr. Olson:

The Department of Ecology (Ecology) reviewed the request for an extension of the removal dates for 13 Hose in Hose Transfer Lines (HIHTLs) specified in the HIHTL quarterly report, dated June 19, 2014. As stated in meetings and in your June 11, 2014 e-mail, the below listed HIHTLs no longer have an identified use, or will have exceeded their service life by the end of fiscal year (FY) 2014, and need to remain in C-farm because removing them according to the current schedule is in conflict with important on-going Single Shell Tank retrieval work activities.

Ecology understands that removing these HIHTLs would adversely impact the on-going retrieval activities and may pose an additional threat to human health and the environment due to their co-location with HIHTLs being used for on-going C-Farm retrieval work. Additional worker exposure or physical damage to the still-needed HIHTLs could occur if the lines are removed during C-Farm retrieval operations. Therefore, Ecology approves extending the removal dates for the following HIHTLs to the end of FY 2015.

- I-12023-0-01
- I-12023-0-02
- I-12023-0-03
- I-12023-0-04
- I-12023-0-05
- I-12023-0-06
- I-15390-0-19
- I-15390-0-20
- I-63204-0-01
- I-63204-0-02
- I-65376-0-01
- I-65376-0-02
- I-65376-0-03

July 21, 2014

Page 2

It is Ecology's expectation that any disconnected HIHTLs have been drained, flushed, and capped on the open ends (i.e. those ends not connected to transfer equipment), to ensure they present very limited risk to human health and the environment until removed and disposed.

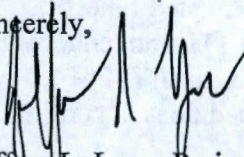
Ecology continues to review the *Temporary Waste Transfer Line Management Program Plan*, RPP-12711, Revision 7, which you submitted for approval. Once our review is complete, comments will be provided to you, which Ecology believes will improve the readability and incorporate the pertinent regulatory requirements.

Our goal is to provide comments that will help revise the plan to ensure that operation and disposal of the HIHTLs is compliant with applicable portions of 40 Code of Federal Regulations incorporated by reference at Washington Administrative Code 173-303-400, "Dangerous Waste Regulations – Interim status facility standards", Hanford Federal Facility Agreement and Consent Order, and State of Washington v. Steven Chu Consent Decree requirements.

The intended path forward for the disposition of individual HIHTLs will need to be identified before we send you our comments on RPP-12711, Revision 7. Ecology staff will contact you to set up a meeting to discuss regulatory compliant options.

If you have any questions or require clarification, please contact me at [jeff.lyon@ecy.wa.gov](mailto:jeff.lyon@ecy.wa.gov) or (509) 372-7914, or Jared Mathey at [jared.mathey@ecy.wa.gov](mailto:jared.mathey@ecy.wa.gov) or (509) 372-7949.

Sincerely,



Jeffery L. Lyon, Project Manager  
Tank System Operations and Closure  
Nuclear Waste Program

jm/tkb

## cc electronic:

Dave Bartus, EPA  
Jack Boller, EPA  
Mary Beth Burandt, USDOE  
Lori Huffman, USDOE  
Chris Kemp, USDOE  
Phillip Udom, USDOE  
Jeff Vanderpol, USDOE  
Mike Erhart, WRPS  
Randall Fox, WRPS  
Michael Greene, WRPS  
Jessica Joyner, WRPS  
Jeff Lyon, Ecology  
Jared Mathey, Ecology  
USDOE-ORP Correspondence Control  
Environmental Portal

cc: Stuart Harris, CTUIR  
Gabriel Bohnee, NPT  
Russell Jim, YN  
Steve Hudson, HAB  
Administrative Record: ✓  
Tank Farms - HIHTLs  
WRPS Correspondence Control