



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 26, 2019

19-NWP-134

Brian T. Vance, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Re: United States Department of Energy– Office of River Protection (USDOE-ORP) Disapproval of
Federal Facility Agreement and Consent Order (HFFACO) Change Form for Interim Barriers

Dear Brian T. Vance:

USDOE-ORP disapproved the Department of Ecology's (Ecology) proposed HFFACO Change Number M-45-19-03 for design and construction of interim surface barriers over the entirety of five tank farms. Your letter 19-ORPMGR-0006, stated that USDOE-ORP disapproved the change because it was not discussed in the System Plan negotiations. Ecology agrees with USDOE-ORP's rationale.

Your letter proposed to further discuss this change package with the United States Environmental Protection Agency and Ecology. HFFACO milestone M-045-56 includes a requirement for Ecology and USDOE-ORP to meet yearly, at a minimum, to discuss additional HFFACO interim measures. We have discussed interim barriers during prior year meetings under M-045-56.

Ecology will propose milestones for interim barriers during the next meeting under M-045-56. Therefore, Ecology believes that the disapproval of Change Number M-45-19-03 does not have to be resolved as a HFFACO dispute.

If there are questions regarding this letter, please contact Jeff Lyon, M-45 Project Manager, at jeff.lyon@ecy.wa.gov or (509) 372-7914.

Sincerely,


Alexandra K. Smith
Program Manager
Nuclear Waste Program

jbp/so

cc: See page 2

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cc electronic w/enc:

Dave Einan, EPA
Dustin M. Stewart, USDOE
Jon Perry, MSA
Michael Turner, MSA
Jessica Joyner, WRPS
ERWM Staff, YN
Ken Niles, ODOE
Jim Alzheimer, Ecology
Theresa Howell, Ecology
Jeff Lyon, Ecology
Nina Menard, Ecology
John Price, Ecology
Maria Skorska, Ecology
Alex Smith, Ecology
Environmental Portal
Hanford Facility Operating Record
MSA Correspondence Control
USDOE-ORP Correspondence Control
WRPS Correspondence Control

cc: Susan Leckband HAB
Hanford Administrative Record
NWP Central File

cc w/o enclosure:

Matt Johnson CTUIR
Jack Bell, NPT
Laurene Contreras, YN