



U.S. Department of Energy Hanford Site

February 18, 2021

21-TF-000513

Mr. David Bowen, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Mr. Bowen:

WASTE MANAGEMENT AREA A-AX BOUNDARY

- References:
1. RPP-RPT-60227, Revision 1, *Data Quality Objectives for Vadose Zone Characterization at Waste Management Area A-AX*, February 2019, U.S. Department of Energy, Richland, Washington.
 2. Federal Facility Agreement and Consent Order Change Control Form, Change Number M-45-19-04, *Establish Closure Milestones for Waste Management Area A/AX*, July 25, 2019, Washington State Department of Ecology and U.S. Department of Energy, Richland, Washington.
 3. *Meeting Notes Waste Management Area A-AX: Data Quality Objectives Step 4, Define the Boundaries of the Study*, WMA-A-AX-DQO-2020-01, September 1, 2020, Washington State Department of Ecology and U.S. Department of Energy, Richland, Washington.
 4. *Meeting Notes Waste Management Area A-AX: Follow-Up Meeting on Data Quality Objectives Step 4, Define the Boundaries of the Study*, WMA-A-AX-DQO-2020-02, September 16, 2020, Washington State Department of Ecology and U.S. Department of Energy, Richland, Washington.
 5. *Meeting Notes Waste Management Area A-AX: Boundary Discussion*, WMA-A-AX-DQO-2020-04, November 3, 2020, Washington State Department of Ecology and U.S. Department of Energy, Richland, Washington.

6. Federal Facility Agreement and Consent Order Change Control Form, Change Number C-13-01, *Assignment of Waste Sites to the 200-IS-1 Operable Unit in the Tri-Party Agreement (TPA) Appendix C*, June 30, 2017, Washington State Department of Ecology and U.S. Department of Energy, Richland, Washington.

The purpose of this letter is to notify the Washington State Department of Ecology (Ecology) of U.S. Department of Energy (DOE), Office of River Protection's path forward with regard to identifying the Waste Management Area (WMA) A-AX boundary that will be incorporated into planning efforts for the WMA A-AX Resource Conservation & Recovery Act of 1976 (RCRA) facility investigation (RFI) soil sampling. The overall WMA A-AX soil investigation boundary has been left undefined by the data quality objectives report (RPP-RPT-60227, Reference 1) since 2017. The report instead implemented a "focus area" approach to allow portions of the soil investigation to proceed until the overall WMA boundary could be defined (e.g., Focus Area 1 is the area encompassing Tanks 241-A-104 and A-105). Two focus areas have been defined, and sampling is in progress. Ecology and DOE have not identified any other potential WMA A-AX focus areas of interest within the WMA A-AX fence line.

In keeping with these assumptions and with DOE's goal of establishing a clear, cohesive description of the area to be investigated as a part of the WMA A-AX RFI soil investigation, DOE will define the boundary of WMA A-AX as the area within the A Farm and AX Farm fence line, along with the southern portion of the 200-E-131 polygon containing the 241-A-302B Catch Tank, as shown in Attachment 1. This definition is consistent with prior Tri-Party Agreement (TPA) agreements and will be used in established TPA milestones M-045-97, M-045-98, M-045-102, M-045-103, M-045-104, and future TPA milestones.

In July 2019, Ecology and DOE established *Hanford Federal Facility Agreement and Consent Order* milestones for the WMA A-AX Integration Study and WMA A-AX RFI/Corrective Measures Study (CMS) Work Plan. Accordingly, the Integration Study is due September 31, 2021, and the RFI/CMS Work Plan is due September 31, 2022 (Reference 2). A WMA A-AX boundary must be established so that the work can be completed in support of the deadlines established to submit both documents. DOE's establishment of a clear, cohesive description of the area to be investigated supports efforts to complete the WMA A-AX RFI soil investigation.

During a September 1, 2020, meeting (Reference 3), DOE proposed defining the WMA A-AX boundary in a manner that is consistent with both the TPA's requirements and its processes. The boundary proposed at that time comports with the boundary established in the draft Hanford Facility RCRA Permit, Rev. 9, for the 241-A and 241-AX Tank Farms (area shown in orange in Attachment 2), and the 241-A-302B Catch Tank, which is assigned to WMA A-AX in Appendix B of the TPA Action Plan). DOE further supported its proposed boundary by noting that contaminated soil waste site 200-E-131 is not identified in the TPA. During the September 1, 2020, meeting, DOE recommended the segmentation of 200-E-131 into three portions and assignment for cleanup purposes, as follows:

- Segment the portion located inside the AY, AZ, and AN Tank Farm fence lines, and assign to the Double-Shell Tank (DST) system RCRA unit (Attachment 2, blue area).
- Segment the polygon portion east of the A Farms, and assign to an operable unit (OU), excluding the assignment of the 241-A-302B Catch Tank to WMA A-AX (Attachment 2, lavender area).
- Segment the portion inside the WMA A-AX fence line, and assign to WMA A-AX (Attachment 2, orange area).

In the September 1, 2020, meeting and a subsequent meeting on September 16, 2020 (Reference 4), Ecology counter-proposed an expansion of the WMA A-AX soil investigation boundary that includes three locations beyond the fence lines of A Farm and AX Farm:

- Include the 244-AR Vault in the WMA A-AX investigation.
- Conduct sampling of soil around DST AY-102 concurrent with the WMA A-AX soil investigation.
- Include the entire 200-E-131 polygon east of the A Farms in the WMA A-AX investigation.

Ecology and DOE met again on November 3, 2020 (Reference 5), to discuss the soil investigation boundary. During this meeting, Ecology took action to review their proposal to include the 244-AR Vault in the WMA A-AX investigation. In January 2021, DOE and Ecology met several times and during these meetings, Ecology reiterated its September 1, 2020, proposal as to the extent of the area to be investigated as part of the WMA A-AX investigation efforts (refer to three bullets above). DOE identified several issues with these proposals; however, in its effort to support the timely completion of the WMA A-AX Integration Study and subsequent WMA A-AX RFI/CMS TPA milestones, DOE will make the following assumptions regarding the boundary of WMA A-AX.

- Investigation of the 244-AR Vault structure and soil should be addressed through the 200-IS-1 OU as agreed during previous negotiations (Reference 6) and as documented in the TPA. Appendix C of the TPA Action Plan assigns the 244-AR Vault to the 200-IS-1 OU and marks the vault with a double asterisk footnote, indicating that RCRA closure and permitting is to be coordinated with OU activities. DOE agrees that a RCRA closure plan will need to be developed for the 244-AR Vault.
- Investigation of the soil surrounding DST AY-102 is not within the scope of WMA A-AX. The DST System and the Single-Shell Tank System are separate RCRA units subject to differing requirements under the TPA. DOE will follow all requirements identified in an approved closure plan that addresses AY-102.

Mr. David Bowen
21-TF-000513

-4-

February 18, 2021

- The 200-E-131 polygon east of the A Farms will be segmented into two portions. The southern portion containing 241-A-302B Catch Tank will be addressed with WMA A-AX; the northern portion containing 200-IS-1 OU components (Attachment 1, blue area) will be addressed with an OU.

If you have any questions, please contact me on (509) 376-3567

Sincerely,

**Brian A.
Harkins**

Digitally signed by
Brian A. Harkins
Date: 2021.02.18
14:17:57 -08'00'

Brian A. Harkins, Deputy Assistant Manager
Tank Farms Project
Office of River Protection

TF:RAL

Attachment

cc w/attach:

J. Bell, NPT

R. Buck, Wanapum

L. Contreras, YN

D. R. Einan, EPA

S. Leckband, HAB

J. Lyon, Ecology

N. Menard, Ecology

M. Murphy, CTUIR

P. Rutland, WRPS

M. Woods, ODOE

Administrative Record

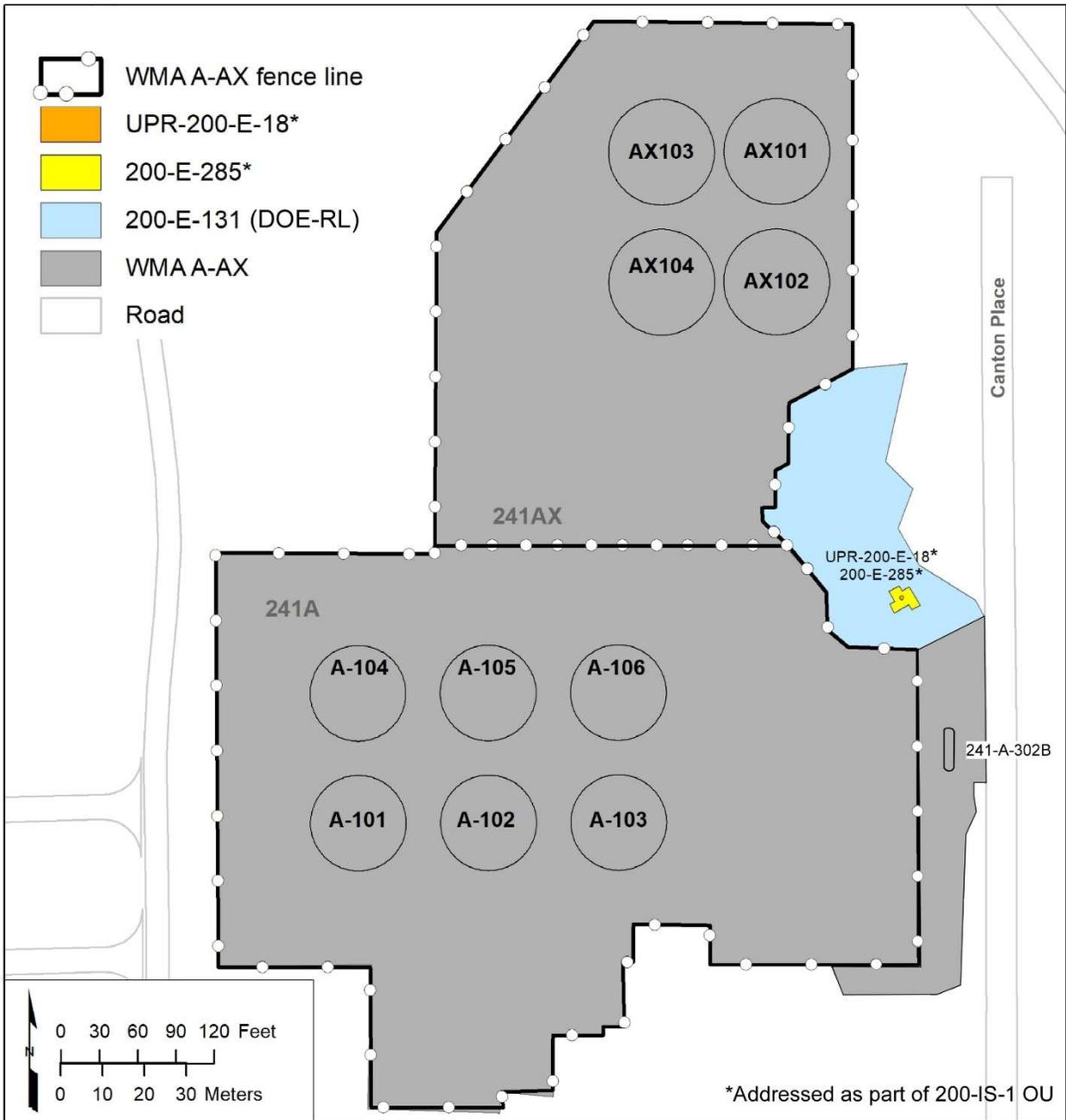
Environmental Portal

WRPS Correspondence

Attachment 1
21-TF-000513

Waste Management Area A-AX Boundary
Definition

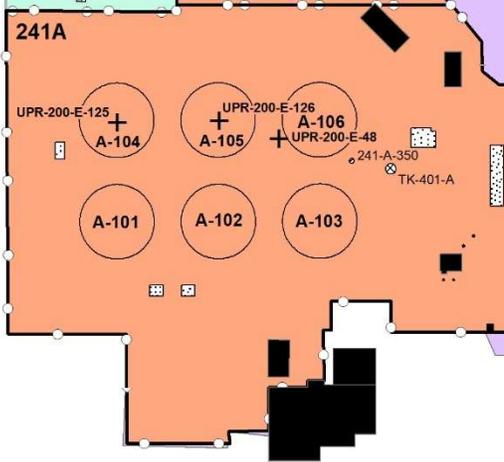
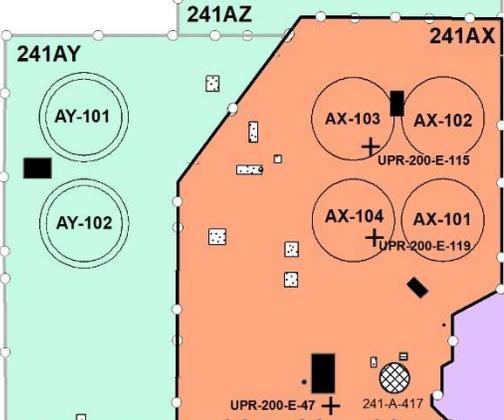
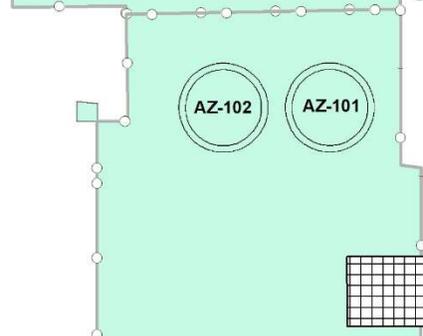
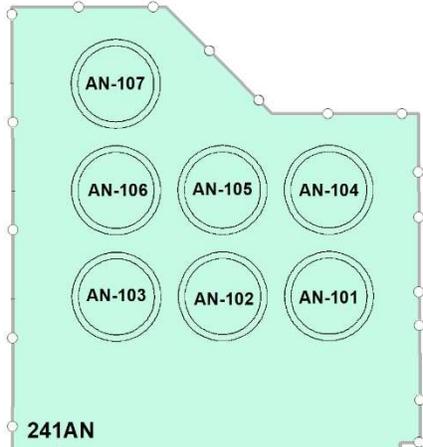
(2 Pages Including Cover Sheet)



Attachment 2
21-TF-000513

Boundary of Consolidated Waste Site 200-E-131

(2 Pages Including Cover Sheet)



- 200-E-131-A (Double-Shell Tank Farms)
- 200-E-131-B (WMA A-AX)
- 200-E-131-C (Polygon)
- Crib
- Other Tank
- Box/Pit/Station
- Building/Structure
- Single-Shell Tank
- Double-Shell Tank
- WMA A-AX Fence Line
- Double-Shell Tank Farm Fence Line
- Unplanned Release
- Ion Exchange Column

0 75 150 225 300 Feet

0 20 40 60 80 Meters

