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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 20, 2004

Mr. Joel Hebdon, Director
Regulatory Compliance and Analysis Division
United States Department of Energy
Richland Operations Office
P. O. Box 550, MSIN: A5-15
Richland, Washington 99352

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EDMC

Dear Mr. Hebdon:

Re: Notification of Completion of Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Settlement and Tentative Agreement Interim Milestone M-91-40, Requirement for United States Department of Energy to Initiate Retrieval in Trench 4 by January 14, 2004

The Washington State Department of Ecology (Ecology) is in receipt of the above referenced notification, submitted by the United States Department of Energy (DOE), dated February 5, 2004.

Milestone M-91-40 (5) requires:

"IN REGARDS TO THE CARBON TETRACHLORIDE VAPOR PLUME IN THE VADOSE ZONE IN THE VICINITY OF TRENCH 4 IN BURIAL GROUNDS 218-W-4C, DOE SHALL:

- START VAPOR EXTRACTION BY NOVEMBER 15, 2003, TO REDUCE CARBON TETRACHLORIDE VAPORS.
- START RETRIEVAL IN TRENCH 4 BY JANUARY 15, 2004.
- COMPLETE RETRIEVAL OF TRENCH 4 BY DECEMBER 31, 2006. (WITH EXCEPTION OF THOSE BOXES AND LARGE CONTAINERS THAT THE PARTIES HAVE AGREED, IN WRITING, MAY BE RETRIEVED OUT OF SEQUENCE.)

RETRIEVAL WILL CONTINUE IN TRENCH 4 UNTIL IT IS COMPLETE. VAPOR EXTRACTION AND RETRIEVAL OPERATIONS IN TRENCH 4 WILL BE INTEGRATED BY DOE TO MINIMIZE POTENTIAL WORKER EXPOSURE TO CARBON



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TETRACHLORIDE VAPORS, AND TO MITIGATE ANY POSSIBLE RELEASES OF CARBON TETRACHLORIDE FROM TRENCH 4 CONTAINERS.”

Based on the above, Ecology has determined that DOE's action "initiating retrieval of Retrievably Stored Waste at burial ground 218-W-4C Trench 4 on January 12" addresses only one part of Milestone M-91-40 (5) and does not constitute completion of all requirements set forth under M-91-40 (5) and Milestone M-91-40. Ecology supports DOE's efforts to accomplish all necessary work to assure compliance with initiation of retrieval of buried waste, retrieval rates, and completion of waste retrieval activities as specified in the full scope of requirements set forth in Agreement Change Order M-91-03.

Sincerely,



Fred C. Jamison
Waste Management Project Manager
Nuclear Waste Program

FCJ:nc

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