



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

August 13, 2015

15-NWP-159

Mr. Ray J. Corey  
Richland Operations Office  
United States Department of Energy  
PO Box 550, MSIN: A5-11  
Richland, WA 99352

Re: Transmittal of Calendar Year 2014 Hanford Site Mixed Waste Land Disposal Restrictions (LDR)  
Full Report. DOE/RL-2015-08, Revision 0 (Letter 15-AMRP-0120)

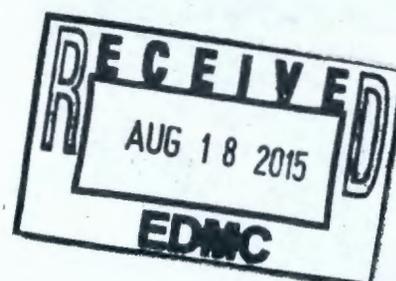
Dear Mr. Corey:

The Department of Ecology (Ecology) received the Calendar Year 2014 Hanford Site Mixed Waste Land Disposal Restrictions Full Report on April 30, 2015, pursuant to Hanford Federal Facility Agreement and Consent Order (HFFACO) Milestone M-26-01. Ecology extended the 60-day comment period by an additional 60 days and has now completed its initial review of the LDR Report.

Ecology, as the lead regulatory agency for this Primary Document and in conjunction with United States Environmental Protection Agency (EPA), found the Calendar 2014 LDR Report to be incomplete and inadequate to fulfill the requirements of Milestone M-026-01, the Federal Facilities Compliance Act of 1992, and the Resolution of Conflict of March 14, 2002.

Specifically, Ecology has identified the following list of major issues:

- **Treatment**
  - Treatability Groups must be specific to each waste stream with common treatment and disposal requirements; i.e., broad Treatability Groups that combine multiple treatment and disposal needs and requirements are inadequate.
  - All Treatability Group information should be based on waste stream characterization.
  - The Report must document specific projected waste volumes of waste streams to be treated during the next 5-year period.
  
- **Treatment Schedules**
  - Milestones and Interim Schedules for all waste streams must be provided.
  - All treatment completion dates by individual waste streams and technologies must be included.
  - Limit use of "Treatment not yet selected."



Mr. Ray J. Corey  
 August 13, 2015  
 Page 2

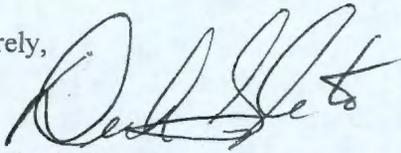
15-NWP-159

- If treatment hasn't been selected, there must be a schedule to characterize the waste and develop and select the treatment technology.
  - Schedules to develop treatment technologies must include all key development and acquisition steps (including interim milestones).
- **Storage**
    - Storage assessments must be completed and documented for all potential mixed waste.
    - Complete Section 2.2 detail for all Location-Specific Data Sheets (LSDS) to identify where wastes are located at the sites; e.g., building locations and amounts of waste.

As a result of our findings, and in accordance with Section 9.2.1 and Figure 9-1 of the HFFACO Action Plan (Review and Comment on Primary Documents), Ecology requests the United States Department of Energy (USDOE) to respond to Ecology's major issues listed above and provide a plan for document update **within 30 days from receipt of this letter**. Ecology will submit additional comments on details in the report that may also need to be addressed by USDOE following the resolution of the major issues. Ecology will be ready to approve this document as a Primary Document following successful completion of this process.

If you have any questions, please contact me at [dsin461@ecy.wa.gov](mailto:dsin461@ecy.wa.gov) or (509) 372-7923 or Elis Eberlein at [eber461@ecy.wa.gov](mailto:eber461@ecy.wa.gov) or (509) 372-7906.

Sincerely,



Deborah Singleton  
 Waste Management Section Project Manager  
 Nuclear Waste Program

cc electronic:

Dennis Faulk, EPA  
 Thomas Fletcher, USDOE-ORP  
 Mike Collins, USDOE-RL  
 Al Farabee, USDOE-RL  
 Rob Piippo, MSA  
 Dalena Weyns, MSA  
 Harold Tilden, PNNL  
 Ken Niles, ODOE  
 Environmental Portal  
 Correspondence Control, USDOE-RL  
 Correspondence Control, USDOE-ORP  
 Hanford Facility Operating Record  
 Elis Eberlein, Ecology  
 Stuart Luttrell, Ecology  
 Deborah Singleton, Ecology  
 Ron Skinnerland, Ecology

cc:

Stuart Harris, CTUIR  
 Gabriel Bohnee, NPT  
 Russell Jim, YN  
 Rex Buck, Wanapum  
 Steve Hudson, HAB  
 Administrative Record  
 NWP Central File  
 NWP Reader File

