



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 15, 2021

21-NWP-012

Brian A. Harkins, Deputy Assistant Manager
Tank Farms Division
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Department of Ecology's (Ecology) Review Comment Records (RCRs) for the Tier 3
Component Closure Plans RPP-PLAN-63990, RPP-PLAN-63246, and RPP-RPT-56390

References: See page 2

Dear Brian A. Harkins:

Ecology reviewed the United States Department of Energy – Office of River Protection's three updated Tier 3 Closure Plans (References 1, 2, and 3), received by email from Rob Lobos on September 1, 2020.

The three enclosed RCRs contain our review of the updated Tier 3 Closure Plans for Waste Management Area C.

If you have any questions, please contact me at jeff.lyon@ecy.wa.gov or (509) 372-7914, or Kyle Rucker at kyle.rucker@ecy.wa.gov or (509) 372-7985.

Sincerely,

Menard, Nina (ECY)  Digitally signed by Menard, Nina
(ECY)
Date: 2021.01.15 17:09:52 -08'00'

for Jeffery J. Lyon
Tank Systems Operation & Closure Project Manager
Nuclear Waste Program

kr/aa
Enclosures (3)

cc: See page 2

References:

1. Document RPP-PLAN-63246, Revision 2, dated March 2020, *Tier 3 Resource Conservation and Recovery Act (RCRA) Component Closure Activity Plan for the 241-C-107 through 241-C-112 Tank*
2. Document RPP-PLAN-63990, Revision 0, dated July 2020, *Tier 3 Resource Conservation and Recovery Act (RCRA) Component Closure Activity Plan for the 241-C-101 through 241-C-106 Tanks*
3. Document RPP-RPT-59390, Revision 2, dated June 2020, *Tier 3 Resource Conservation and Recovery Act (RCRA) Component Closure Activity Plan for 241-C-200 Series Tanks*

cc electronic w/enc:

David Einan, EPA
Rob Lobos, USDOE-ORP
Jon Perry, MSA
Margaret Lamothe, WRPS
Paul Rutland, WRPS
Mason Murphy, CTUIR
Jack Bell, NPT
Rex Buck, Jr., Wanapum
Laurene Contreras, YN
ERWM Staff, YN
Susan Leckband, HAB
David Reeploeg, Hanford Communities
Max Woods, ODOE
Jim Alzheimer, Ecology
Mike Barnes, Ecology
Jeff Lyon, Ecology
Nina Menard, Ecology
Kyle Rucker, Ecology
Maria Skorska, Ecology
NWP RIM Coordinators, Ecology
Environmental Portal
Hanford Administrative Records
Hanford Facility Operating Record
MSA Correspondence Control
USDOE-ORP Correspondence Control
WRPS Correspondence Control

3	Page 1-1 Section 1.0 Lines 42-46	Propose editing the paragraph to read: Consistent with the HFFACO, Part One, Article IV, Paragraph 19, t This RCRA Tier 3 Plan addresses residual <u>mixed</u> waste in the tanks, including radioactive material subject to regulation under the <i>Atomic Energy Act of 1954</i> (AEA). However, the inclusion of information about such material <u>the radionuclide component of mixed waste</u> here does not confer authority to Ecology over otherwise exempt source material, spent, byproduct material, and or special nuclear material regulated under (as defined by the AEA) <u>that is otherwise exempt from RCRA regulation under 42 U.S.C. §6903(27).</u>				cc
4	Page 1-2/ Section 1.1/ Lines 9-11	Reference the relevant parts of the Tier 2 closure plan for soil corrective action.				th
5	Page 1-2/ Section 1.1/ Line 14	What does “as available” mean? This term should be deleted; it’s required to be addressed in the CERCLA ROD per the II.Y condition.				th
6	Page 1-4/ Section 1.1.2/ Lines 10-11; Table A-1	This statement is inaccurate. Update to reflect the agreed upon practicability language from other closure plans. A practicability demonstration for WMA C soils has not been developed. Further, the practicability demonstration for the system will be incorporated into the permit by reference and should be cited accordingly. (Also applies to table in Appendix A.)				th
7	Page 1-5/ Section 1.1.2/ Line 3	This is inaccurate. Ecology has not made a decision regarding practicability of clean closure for WMA C (and even the system, for that matter, until the practicability demonstration for the system is incorporated into the permit).				th
8	Page 1-5/ Section 1.1.2/ Lines 18-20	Ensure that all addenda are listed and language is consistent across all Tier 1, 2, and 3 closure plans.				ms
9	Page 1-20/ Section 1.4.2/ Lines 14-18	This section should cite the OUs each of the UPR waste sites are in and the decision document where a final disposition decision will be made for these sites (if applicable) or state how the WIDS sites will be dispositioned.				th
10	Page 1-21/ Section 1.4.2/ Lines 14-16	This should cite the Tier 2 closure plan where the RCRA corrective action process/corrective action decision will be captured.				th
11	Page 1-21/ Section 1.4.2/ Lines 18-23	Add "including corrective action for dangerous waste constituents"				th

12	Page 2-1/ Section 2.0/ Footnote 1; Table A-1	If the Post-Closure Care Plan (Addendum K) for WMA C is in place, this should be cited. (Also applies to table in Appendix A.)				ds
13	Page 2-2/ Section 2.0/ Lines 5-6; Table A-1	If the Groundwater Monitoring Plan (Addendum D) for WMA C is in place, this should be cited instead of saying it is forthcoming. (Also applies to table in Appendix A.)				th
14	Page 3-2/ Section 3.1/ Lines 5-6	Provide more detail about the timing of development of these engineering documents.				ds
15	Page 3-6/ Section 3.2.3, Lines 31-37	Also cite the corrective action decision for the Tier 2/WMA C closure plan here, as well as the other volumes of the PA.				th
16	Page 3-10/ Section 3.6/ Lines 20-21	The sentence beginning “Barriers will be evaluated and addressed in a Corrective Measures Study...” does not make sense. The CMS has already been approved by Ecology.				ms
17	Page 3-10/ Section 3.6/ Line 22	Replace “will be addressed” with “will be installed” in this sentence.				th
18	Page 4-1/ Section 4.0/ Lines 7-9	Retrieval is part of closure activities. Therefore, a date could be cited here.				th

3	Page 1-1 Section 1.0 Lines 41-45	Propose editing the paragraph to read: Consistent with the HFFACO, Part One, Article IV, Paragraph 19, t This RCRA Tier 3 Plan addresses residual mixed waste in the tanks, including radioactive material subject to regulation under the <i>Atomic Energy Act of 1954</i> (AEA). However, the inclusion of information about such material <u>the radionuclide component of mixed waste</u> here does not confer authority to Ecology over otherwise exempt source material, spent, byproduct material, and or special nuclear material regulated under (as defined by the AEA) <u>that is otherwise exempt from RCRA regulation under 42 U.S.C. §6903(27).</u>				cc
4	Page 1-2/ Section 1.1/ Lines 9-11	Reference the relevant parts of the Tier 2 closure plan for soil corrective action.				th
5	Page 1-2/ Section 1.1/ Line 14	What does “as available” mean? This term should be deleted; it’s required to be addressed in the CERCLA ROD per the II.Y condition.				th
6	Page 1-4/ Section 1.1.2/ Lines 10-11; Table A-1	This statement is inaccurate. Update to reflect the agreed upon practicability language from other closure plans. A practicability demonstration for WMA C soils has not been developed. Further, the practicability demonstration for the system will be incorporated into the permit by reference and should be cited accordingly. (Also applies to table in Appendix A.)				th
7	Page 1-4/ Section 1.1.2/ Line 18	This is inaccurate. Ecology has not made a decision regarding practicability of clean closure for WMA C (and even the system, for that matter, until the practicability demonstration for the system is incorporated into the permit).				th
8	Page 1-5/ Section 1.1.2/ Lines 14-16	Ensure that all addenda are listed and language is consistent across all Tier 1, 2, and 3 closure plans.				ms
9	Page 1-13/ Section 1.4.2/ Lines 29-31	This should cite the Tier 2 closure plan where the RCRA corrective action process/corrective action decision will be captured.				th
10	Page 1-13/ Section 1.4.2/ Lines 33-38	Add "including corrective action for dangerous waste constituents"				th

11	Page 2-1/ Section 2.0/ Footnote 1; Table A-1	If the Post-Closure Care Plan (Addendum K) for WMA C is in place, this should be cited. (Also applies to table in Appendix A.)				ds
12	Page 2-2/ Section 2.0/ Lines 5-6; Table A-1	If the Groundwater Monitoring Plan (Addendum D) for WMA C is in place, this should be cited instead of saying it is forthcoming. (Also applies to table in Appendix A.)				th
13	Page 3-2/ Section 3.1/ Lines 4-5	Provide more detail about the timing of development of these engineering documents.				ds
14	Page 3-6/ Section 3.2.3, Lines 26-30	Also cite the corrective action decision for the Tier 2/WMA C closure plan here, as well as the other volumes of the PA.				th
15	Page 3-11/ Section 3.6/ Lines 7-8	The sentence beginning “Barriers will be evaluated and addressed in a Corrective Measures Study...” does not make sense. The CMS has already been approved by Ecology.				ms
16	Page 3-11/ Section 3.6/ Line 9	Replace “will be addressed” with “will be installed” in this sentence.				th
17	Page 4-1/ Section 4.0/ Lines 7-9	Retrieval is part of closure activities. Therefore, a date could be cited here.				th

REVIEW COMMENT RECORD		Date: January 15, 2021	Review No.		
		Project No.	Page: 1 of 3		
Document Number(s)/Title(s) RPP-RPT-59390, Rev 02, Tier 3 RCRA Component Closure Activity Plan for 241-C-200 Series Tanks	Program/Project/Building Number NWP	Reviewer	Organization/Group	Location/Phone	

Comment Submittal Approval: Agreement with indicated comment disposition(s) Status:

Organization Manager (Optional) _____
Date Reviewer/Point of Contact _____
Date Reviewer/Point of Contact

Author/Originator _____
Author/Originator

Item	Page #/section # Line #	Comment (s) (Provide technical justification for the comment and detailed recommendation of the action required to correct/resolve the discrepancy/problem indicated.)	Hold Point	Disposition (Provide justification if NOT accepted.)	Status	Reviewer Initials
1	Page i/ Executive Summary/ Lines 24-25	Propose deleting “to support Waste Management Area C closure, which is based on a landfill closure approach” and replace with “as a landfill,”				th
2	Page i/ Executive Summary/ Lines 31-35	Propose editing this paragraph to read: This Component Closure Activity Plan does not discuss <u>radioactive waste classification requirements that are outside the scope of RCRA/HWMA determinations and or radioactive waste-specific closure requirements that apply actions that the U.S. Department of Energy may take under the Atomic Energy Act of 1954.</u> Where this RCRA Tier 3 Plan provides data or discussions about materials regulated under the Atomic Energy Act of 1954 <u>the radionuclide component of mixed waste</u> , that information is provided for informational purposes only. Please also refer to our letter 21-NWP-006 for our thoughts on this matter.				cc

3	Page 1-1 Section 1.0 Lines 41-45	Propose editing the paragraph to read: Consistent with the HFFACO, Part One, Article IV, Paragraph 19, t This RCRA Tier 3 Plan addresses residual <u>mixed</u> waste in the tanks, including radioactive material subject to regulation under the <i>Atomic Energy Act of 1954</i> (AEA). However, the inclusion of information about such material <u>the radionuclide component of mixed waste</u> here does not confer authority to Ecology over otherwise exempt <u>source material, spent, byproduct material, and or special nuclear material regulated under (as defined by the AEA) that is otherwise exempt from RCRA regulation under 42 U.S.C. §6903(27).</u>				cc
4	Page 1-2/ Section 1.1/ Lines 9-11	Reference the relevant parts of the Tier 2 closure plan for soil corrective action.				th
5	Page 1-2/ Section 1.1/ Line 13	What does “as available” mean? This term should be deleted; it’s required to be addressed in the CERCLA ROD per the II.Y condition.				th
6	Page 1-4/ Section 1.1.2/ Lines 9-10; Table A-1	This statement is inaccurate. Update to reflect the agreed upon practicability language from other closure plans. A practicability demonstration for WMA C soils has not been developed. Further, the practicability demonstration for the system will be incorporated into the permit by reference and should be cited accordingly. (Also applies to table in Appendix A.)				th
7	Page 1-4/ Section 1.1.2/ Line 17	This is inaccurate. Ecology has not made a decision regarding practicability of clean closure for WMA C (and even the system, for that matter, until the practicability demonstration for the system is incorporated into the permit).				th
8	Page 1-5/ Section 1.1.2/ Lines 9-11	Ensure that all addenda are listed and language is consistent across all Tier 1, 2, and 3 closure plans.				ms
9	Page 1-11/ Section 1.4.2/ Lines 1-3	This should cite the Tier 2 closure plan where the RCRA corrective action process/corrective action decision will be captured.				th

10	Page 1-11/ Section 1.4.2/ Lines 5-10	Add "including corrective action for dangerous waste constituents"				th
11	Page 2-1/ Section 2.0/ Footnote 1; Table A-1	If the Post-Closure Care Plan (Addendum K) for WMA C is in place, this should be cited. (Also applies to table in Appendix A.)				ds
12	Page 2-2/ Section 2.0/ Lines 4-5; Table A-1	If the Groundwater Monitoring Plan (Addendum D) for WMA C is in place, this should be cited instead of saying it is forthcoming. (Also applies to table in Appendix A.)				th
13	Page 3-2/ Section 3.1/ Lines 5-6	Provide more detail about the timing of development of these engineering documents.				ds
14	Page 3-6/ Section 3.2.3, Lines 21-25	Also cite the corrective action decision for the Tier 2/WMA C closure plan here, as well as the other volumes of the PA.				th
15	Page 3-10/ Section 3.6/ Lines 45-46	The sentence beginning "Barriers will be evaluated and addressed in a Corrective Measures Study..." does not make sense. The CMS has already been approved by Ecology.				ms
16	Page 3-11/ Section 3.6/ Line 1	Replace "will be addressed" with "will be installed" in this sentence.				th
17	Page 4-1/ Section 4.0/ Lines 7-8	Retrieval is part of closure activities. Therefore, a date could be cited here.				th