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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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June 12, 2006

Mr. Keith A. Klein  
Richland Operations Office  
United States Department of Energy  
P.O. Box 550, MSIN: A7-50  
Richland, Washington 99352

Mr. Roy J. Schepens  
Office of River Protection  
United States Department of Energy  
P.O. Box 450, MSIN: H6-60  
Richland, Washington 99352

Re: United States Department of Energy Calendar Year (CY) 2005 Land Disposal Restrictions (LDR) Summary Report, submitted in accordance with M-26-01P

Dear Mr. Klein and Mr. Schepens:

This is in response to your letter and attached CY 2005 LDR Summary Report, submitted April 28, 2006, to Mr. Nicholas Ceto of the United States Environmental Protection Agency and Ms. Jane Hedges of the Department of Ecology.

In accordance with the Hanford Facility Agreement and Consent Order, Milestone M-26-01P, this report was submitted as a primary document which requires the lead regulatory agency to respond within 45 days. This letter and the enclosed comment pages constitute Ecology's response.

If you would like to discuss Ecology's comments on the CY 2005 LDR Summary Report, contact me at 509-372-7929.

Sincerely,

Eric Van Mason  
LDR Report Manager  
Nuclear Waste Program

EVM:pll  
Enclosure  
cc: See next page

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Mr. Klein and Mr. Schepens  
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cc w/enc:

Greg Sinton, USDOE-RL  
Woody Russell, USDOE-ORP  
John Guberski, CH2M  
Tony Miskho, FHI  
Harold Tilden, PNNL  
Environmental Portal  
Administrative Record

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Stuart Harris, CTUIR  
Gabriel Bohnee, NPT  
Russell Jim, YN  
Todd Martin, HAB  
Ken Niles, ODOE

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|   | Information<br>SST Waste  |   |  |  |  |
|---|---|---|--|--|--|
| 4 | Page 5-1 Table 5-1 Storage Volume and Number of Containers for Selected Hanford Locations CWC | Is classified waste stored at CWC captured within the volumes listed?   |  |  |  |
| 5 | Table 1-1, p. 1-5, 222-S Laboratory Complex Generation projection 2010 (m <sup>3</sup> )      | hows 1 m <sup>3</sup> , rather than 11 in years following. If assumption is made that WTP Lab will be operational by 2010 and need for 222-S will disappear, assumption does not recognize delay in construction/hot start of WTP. Not clear that RL and ORP are integrating planning for use of 222-S.                                 |  |  |  |
| 6 | Sec. 1.2. ¶ 1, sentence 2 Mixed waste managed... are not reported.                            | TYPO – change are to is.  |  |  |  |
| 7 | Table 1-1, p. 1-8, Purgewater Generation projection for 2010                                  | The table does not contain volumes of purgewater that will be generated in 2010. By implication, either sampling efforts will be suspended or purgewater will be collected and taken directly to PSTF or ETF for treatment (Table 1-2). Please clarify the process to treat purgewater after 2009.                                      |  |  |  |
| 8 | Table 1-2 Title "Treatability Group...and Disposal Activities                                 | Title is not accurate. Disposal Activities not included in information. While LDR implies land disposal, paths for individual units are not included.   |  |  |  |
| 9 | Table 1-4, p. 1-16, 241-Z Heels, associated   | Schedule information states waste to be dispositioned as CERCLA non-time critical removal action, with 241-Z facility transition and dismantlement due by September 30, 2011. FY07 budget request states that dismantlement/demolition of the 241-Z facility will be complete by the end of FY07 (DOE/CF-006, Vol. 5, p. 246). From the |  |  |  |

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|    | pipng, line flushing and sludge cleanout.  | information provided, the waste from that dismantlement would appear to be non-mixed in large part. Please confirm.   |  |  |  |
| 10 | Table 1-4, p. 1-16, 241-Z-361<br>Tank containing waste from past practices                         | Text states that a data gap plan is scheduled for 1 <sup>st</sup> Qtr 2007 and remediation is scheduled for 2009 to 2011. That information would appear to be outdated, based on the DOE/CF-006, Vol 5 information, if the USDOE RL intends to complete 241-Z D4 in FY07. |  |  |  |
| 11 | Table 1-4, various locations<br>See the location-specific data sheets for details regarding waste. | Data sheets are not transmitted with the summary. Needs clarification.  |  |  |  |
| 12 | General Comment  | The 241-U-361 settling tank is not included in the report. If the waste in this tank is not intended for direct disposal at ERDF, it should be included in the report.  |  |  |  |
|    |  |   |  |  |  |