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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

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April 13, 2016

16-NWP-068

Ms. Stacy Charboneau, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A7-50
Richland, Washington 99352

Re: Determination on Revision to DOE/RL-99-24, Rev. 3 Surveillance and Maintenance
Building for the 221-B Facility (B Plant)

Reference: Letter 16-ESQ-0037, dated February 26, 2016, from Stacy Charboneau, USDOE-RL,
to J. A. Hedges, Ecology, "Dangerous Waste Compliance Inspection on August 19,
2014, at the B Plant Complex, Resource Conservation and Recovery Act (RCRA)
Site ID: WA7890008967, Nuclear Waste Program Compliance Index No.: 14.502"

Dear Ms. Charboneau:

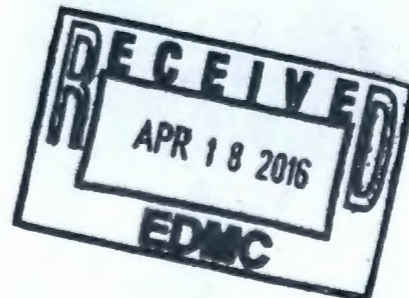
The Department of Ecology (Ecology) received the U.S. Department of Energy-Richland
Operations Office (USDOE-RL) letter 16-ESQ-0037 with the attached Addendum D "Revision
to DOE/RL-99-24, Rev. 3 Surveillance and Maintenance Building for the 221-B Facility (B
Plant)" on February 26, 2016. Ecology reviewed Addendum D and our Review Comment
Record is enclosed.

If you have any questions, please contact Stephanie Schleif, Facility Transition Project Manager,
at stephanie.schleif@ecy.wa.gov or (509) 372-7929, or John Temple, Unit Lead, Permit Writer
at john.temple@ecy.wa.gov or (509) 372-7940.

Sincerely,

Ron Skinnarland
Waste Management Section Manager
Nuclear Waste Program

ss/jvs
Enclosure
cc: See page 2



Ms. Stacy Charboneau
April 13, 2016
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cc electronic w/enc:

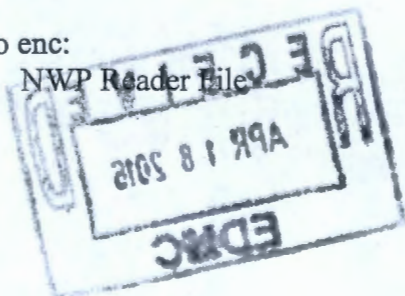
Dave Bartus, EPA
Dennis Faulk, EPA
Mike Collins, USDOE
Al Farabee, USDOE
Jane Borghese, CHPRC
John Ciucci, CHPRC
Brian Dixon, CHPRC
Ray Swenson, CHPRC
Joel Williams, Jr., CHPRC
Jerry Cammann, MSA
Carolyn Noonan, MSA
Jon Perry, MSA
Rob Piippo, MSA
Suzanne Dahl, Ecology
Kelly Elsethagen, Ecology
Edward Holbrook, Ecology
John Price, Ecology
Stephanie Schleif, Ecology
Ron Skinnarland, Ecology
John Temple, Ecology
Environmental Portal
Hanford Facility Operating Record
USDOE-RL Correspondence Control

cc w/enc:

Rod Skeen, CTUIR
Gabriel Bohnee, NPT
Russell, Jim, YN
Steve Hudson, HAB
Administrative Record
NWP Central File

cc w/o enc:

NWP Reader File



Review Comment Record

Washington State Department of Ecology Nuclear Waste Program

Date: April 7, 2016

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Document Title(s)/Number(s)

DOE/RL-99-24, Rev. 3, B Plant Surveillance and Maintenance Plan Review

Document Manager

Project Manager

Facility Site ID

Cleanup Site ID

**Comments on B Plant
Surveillance and
Maintenance Plan**

Stephanie Schleif

(509) 372-7929

OUG – 24,
WA7890008967

Item No.	Pg. # Sec. # Para./Sent.	Comment or Question	Modification Needed	Basis/Justification	U.S.D.O.E. Response	Ecology Response	Open/Close	Reviewer Initials
1	General	Section 8.6 was removed from Section 8 of the TPA during past changes. However, the Surveillance and Maintenance Plan refers Section 8.6 several times.	Remove reference to section 8.6 throughout the document.					
2	Pg. 1-1, Section 1, lines 18-20	There are a number of discrepancies in the Preclosure Work Plan (Section 7). The work plan was supposed to accurately describe the status of the facility at the end of the transition phase. The RD/RA and RI/FS and RCRA Closure Plan will likely use the work plan as a resource. The noted discrepancies in the work plan should be corrected.	Correct the discrepancies in section 7 of the Preclosure Work Plan. Refer to 15-NWP-047 "Dangerous Waste Compliance Inspection on August 19, 2014 at the B Plant Complex, RCRA Site ID: WA7890008967, NWP Compliance Index No.: 14.502" for the discrepancies.					
3	Pg. 1-1, Section 1, lines 25-26	Will the CERCLA removal actions include DWMUs?	Please clarify.					
4	Pg. 1-2, Section 1, lines 3-4	Table 6-1 refers out to other sections to describe how regulatory requirements are being met. The enforceable requirements are established in WAC 173-303, 40 CFR, and the TPA. Table 6-1 only describes how B Plant will comply.	Remove this sentence, "The enforceable requirements in this document are found in Table 6-1; other dialogue and descriptions are for informational purposes only."					
5	Pg. 6-1, Section 6, line 11	DOE O 450.1A is the most current version.	Change "450.1" to "450.1A"					
6	Pg. 6-1, Section 6, line 24	Subsection 7.1.1 of the PreClosure Work Plan only refers to isolation of the tank system. A more appropriate reference would be Section 7	Change "Subsection 7.1.1" to "Section 7"					
7	Table 6-1, Citation WAC 173-303-010 to -120	The requirements for WAC 173-303-010 to -120 deal with: <ul style="list-style-type: none"> • Introductory Regulations • Dangerous Waste Designation • General Recycling Requirements 	Under the Requirement column, delete "Generator Requirements" and replace it with the 3 bulleted items.					

Review Comment Record

Washington State Department of Ecology Nuclear Waste Program

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8	Table 6-1, Citation WAC 173-303-280 to -282	WAC 173-303-280 are the general requirements for dangerous waste management facilities, which are applicable to the DWMUs in the B Plant Complex.	“WAC 173-303-280 to -282” needs to be changed to “WAC 173-303-281 to -282”.					
9	Table 6-1, Citation WAC 173-303-320	“No inspections of TSD units in the B Plant canyon and cells will be performed.” The liquid level monitoring of TK 10-1 is described in the S&M Plan.	It should be clearly stated in the S&M Plan that TK 10-1 will be inspected through monitoring equipment. Please provide to Ecology the TK 10-1 liquid level monitoring process. How are the liquids within the tank managed?					
10	Table 6-1, Citation WAC 173-303-320	“There are significant physical, biological, radiological, and chemical hazards associated with accessing these four tanks”	Provide the following hazards associated with physical, biological, radiological, and chemical hazards: <ul style="list-style-type: none"> • Confined space • Beryllium • Asbestos • Radiological • NAOH • HNO3 and citric acid 					
11	Table 6-1, Citation WAC 173-303-340	Section 8 of the S&M plan is vague and does not demonstrate that certain hazards do not pose a risk to the facility. If this was to be demonstrated in Section 8, it would relieve B Plant from meeting specific requirements identified in WAC 173-303-340(1)(a) through -340(1)(d).	Demonstrate in the S&M Plan that hazards do not pose a risk to the facility, which would relieve them from meeting the requirements identified in 340(1)(a) through 340(1)(d).					
12	Table 6-1, Citation 303- 360	The actions of the emergency coordinator as described in WAC 173-303-360 are applicable.	If these actions are conveyed in the Hanford Emergency Management Plan, DOE-0223 or the Building Emergency Plan, then reference what the emergency coordinator will work to.					
13	Table 6-1 Citation 40 CFR 265 Subpart G and 265.197	“Closure plans will be developed during the disposition phase.”	Include the following language “EPA and Ecology reserve the right to require closure in accordance with Federal and State hazardous waste law, and the Agreement, and to require response or corrective actions in accordance with RCRA and CERCLA and the Agreement, at any time.”					

Review Comment Record

Washington State Department of Ecology Nuclear Waste Program

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14	Table 6-1, Citation 40 CFR 265.191	"This standard is not applicable since the tanks were emptied to the practical and reasonable extent possible with existing plant systems and are inactive and isolated." Fine, but this should refer to the PreClosure Work Plan Sections 7.4.1.3 and 7.4.1.4	Refer to the PreClosure Work Plan Sections 7.4.1.3 and 7.4.1.4					
15	Table 6-1, Citation 40 CFR 265.193	"This standard is not applicable since the tanks were emptied to the practical and reasonable extent possible with existing plant systems and are inactive and isolated." This should refer to the PreClosure Work Plan Section 7.4.1.5 and 7.4.1.6	Refer to the PreClosure Work Plan Section 7.4.1.5 and 7.4.1.6					
16	Table 6-1, Citation 40 CFR 265.194	Requirement – "Provide spill/overflow prevention controls" Applicability – "This standard is not applicable since the tanks were emptied..." What about the use of TK-10-1 for inleakage into the canyon building?	The Surveillance and Maintenance Plan needs to address this DWMU (Tank System), TK-10-1, for inleakage into the canyon. What type of controls are in place?					
17	Table 6-1, Citation 40 CFR 265.174	The current conditions in Cell 4 are identified here, therefore Section 7.4.2.2 of the PreClosure Work Plan should be referenced.	Refer to Section 7.4.2.2 of the PreClosure Work Plan.					
18	Table 6-1, Citation 265.11.1	The documentation regarding the monitoring of differential pressure should be incorporated into the inspection schedule.	Include the monitoring of differential pressure into the inspection schedule.					
19	Table A-1, Row 2	"The inventory of Cell 2 includes TK-2-1, which was used to store spent ion exchange resin from previous cesium recovery operations in Cell 18. It is not a process tank and is not connected to in-cell piping." Are there any F-listed codes associated with T-18 and TK-2-1?	Please specify.					