STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Richland Field Office
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November 8, 2024 24-NWP-207

Naomi M. Jaschke, Director
Soil and Groundwater Division
Hanford Field Office
United States Department of Energy
PO Box 550
Richland, Washington 99352

Re: Transmittal of the Department of Ecology's Comments on the *Interim Status Change Number 1: Interim Status Alternate Groundwater Monitoring Plan for Single-Shell Tank Waste Management Area A-AX*, RCRA-CN-01 DOE/RL-2023-36_R0

Dear Naomi M. Jaschke:

The Department of Ecology is transmitting comments for the above referenced change notice.

Enclosed is the Review Comment Record (RCR) with Ecology's comments.

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

Sincerely,

Digitally signed by Rochette, Beth (ECY)
Date: 2024.11.08 16:04:24 -08'00'

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

ep/mo
Enclosure

cc: See page 2

cc electronic w/ enc:

David Einan, EPA
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Kim Welsch, Ecology
Environmental Portal
Hanford Administrative Record
Hanford Facility Operating Record
HAB Correspondence
HMIS Correspondence Control
USDOE Correspondence Control

Review Comment Record	Washington State Department of Ecology Nuclear Waste Program	Date: 10/31/2024 Page 1 of 1

Document Title(s)/Number(s): *Interim Status Change Number 1: Interim Status Alternate Groundwater Monitoring Plan for the Single-Shell Tank Waste Management Area A-AX RCRA-CN-01 DOE/RL-2023-36-R0*

Document Manager	Telephone Number	Project Manager	Telephone Number	Facility Site ID	Cleanup Site ID
Pierce	(509) 410-5273	Jeff Lyon	(509) 539-1996		

Item No.	Pg. # Sec. # Para. /Sent.	Comment or Question	Modification Needed	Permittee Response	Ecology Response	Open/Close	Reviewer Initials
1	Text and Tables in the document	The "Description of Change" on the Interim Change Form says that PW-2 is replaced with well 299-E25-251 in this monitoring plan. Well 299-E25-251 has been drilled and completed in the well network of this monitoring program. In many instances, however, PW-2 remains in the text/tables instead of being replaced by well 299-E25-251. Examples of such instances: • Table 2-1 (RCR#5) • Section 2.1, Paragraph 1 (RCR#6) • Section 2.1, Paragraph 1 (RCR#7) • Table 2-3 (RCR#8) • Table 2-4 (RCR#11)	Replace planned well PW-2 with 299-E25-251 in the text throughout the document and in tables.				JR CDG
2	Pg. 1-2 Sec. 1 Last Paragraph	The text states that the quality assurance project plan (QAPjP) and sampling protocols for this groundwater monitoring plan are included in CPCC-00417, *Quality Assurance Project Plan for Sampling Protocol for Interim Status Groundwater Monitoring Plans.* Upon review of the section 5, References, the reference for this QAPjP is for the 2022 version (e.g., Revision 0). However, this QAPjP was revised in 2024 (e.g., Revision 1).	Reference the most recent revision of the QAPjP and include a hyperlink.				NSJ
3	Pg. 1-2 Sec. 1 Last Paragraph	Please provide documentation that CPCC-00417, *Quality Assurance Project Plan for Sampling Protocol for Interim Status Groundwater Monitoring Plans,* received a regulatory review and subsequent approval.	See comment.				NSJ
4	Pg. 2-1 Sec. 2.1 Footnote 2	The footnote states, "For the assessment of data usability that is provided in the QAPjP, the previous version(s) of CPCC-00417 in effect during the period under assessment many need to be used." This statement is contradictory to what is in the report, which states that the most current revision (CPCC-00417) is to be used with this monitoring plan.	Use the most current revision of CPC-00417 as indicated in the report.				NSJ
5	Pg. 2-11, Table 2-3	Downgradient and upgradient designations are given for wells listed in Table 2-1. General comment: consider adding downgradient and upgradient designation to the Well Attributes tables in the monitoring plans (e.g., Table 2-3 in this monitoring plan), so that water-table elevations	Suggestion: add the designation of up-/downgradient well to Table 2-3, so that the reader can see this information in the same place where water table elevation and water-level measurement data are given.				JR

		and water-level dates are provided in the same table as up- and down-gradient well information.					
6	Pg. 2-12 Sec. 2.3 Table. 2-4	The table is intended to present the main differences between this monitoring plan and the previous monitoring plan. A difference that is not listed in the table is that the previous monitoring plan included the QAPjP as an appendix (e.g., Appendix A) and the Sampling Protocol as an appendix (e.g., Appendix B). Contrary to that, the project has chosen to reference the QAPjP information for this current monitoring plan (e.g., CPCC-00417, *Quality Assurance Project Plan and Sampling Protocol for Interim Status Groundwater Monitoring Plans*). Please edit the table to reflect this significant difference.	Revise the table to reflect this discrepancy.				NSJ
7	Pg. 3-2 Sec. 3.2.2 1st Sentence	The following sentence reads: "A dangerous waste constituent (Table 2-2) is considered "detected" when its concentration exceeds its respective practical quantitation limit." This is not technically accurate, as a dangerous waste constituent is considered "detected" at concentrations equal to its respective practical quantitation limit as well.	Suggest editing the language as shown: "A dangerous waste constituent (Table 2-2) is considered "detected" when its concentration is equal to or exceeds its respective practical quantitation limit."				NSJ
8	Pg. 3-2 Sec. 3.2.3	The section states that definitions of laboratory and review qualifiers applicable to data generated under this plan are available in HNF-69561, *Analytical Data Qualifier Codes in the Hanford Environmental Information System (HEIS).* This report is shown in section 5, References, however a hyperlink should be included, like has been done for the other referenced documents.	Include a hyperlink.				NSJ
9	Page 3-2 Section 3.2.4 1st Paragraph	New well 299-E25-251 is not included in existing well dangerous waste constituent assessment.	Include new well 299-E25-251 in future quarterly monitoring program.				CDG
10	Pg. 3-2 Sec. 3.2.4 2nd Paragraph	Text includes a statement that contamination levels could be attributed to natural variability in groundwater. Similar rhetoric has been used as a basis to not consider the contamination to be attributable to a release from the unit.	Provide elaborative text on the statement of contamination levels being due to the natural variability in groundwater.				NSJ
11	Pg. 3-3 Sec. 3.2.5 2nd Paragraph 2nd Sentence	The text states, "Ongoing evaluation of dangerous waste constituents (Table 2-2) with a sufficient number of detections from interim status monitoring may be performed using an intra-well comparison approach and prediction interval testing."	Please quantify what is determined to be "a sufficient number of detections."				NSJ
12	Pg. 3-3 Sec. 3.2.5 3rd Paragraph 3rd Sentence	The text states, "If the constituent becomes detected in a sufficient number of samples, a statistical evaluation of the dataset may be performed."	Please quantify what is determined to be "a sufficient number of samples."				NSJ

13	Page 3-3 Section 3.2.7	Text does not identify new well 299-E25-251 and well 299-E25-251 was not identified in Section 3-2.	Clearly identify that new well 299-E25-251 is included in quarterly monitoring program.				CDG
14	Page 3-3 Section 3.2.7	Text reads “As they are drilled and become ready to sample, the new wells will be sampled under this plan.”	Provide information on FY schedule for well installation per M-24 schedule				CDG
15	Page 3-4 Section 3.2.8 1st Paragraph	Existing well network does not include new well 299-E25-251.	Include new well 299-E25-251 in quarterly monitoring program.				CDG