



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Richland Field Office

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

June 18, 2025

25-NWP-096

Anders J. Wiborg, Director  
Tank Farms Program Division  
Hanford Field Office  
United States Department of Energy  
PO Box 550  
Richland, Washington 99352

Re: Transmittal of the Department of Ecology's Review Comment Record (RCR) for the  
*Tank 241-T-101 Active Ventilation Practicability Evaluation*, RPP-RPT-65234 Revision 0

References: See page 2

Dear Anders J. Wiborg:

The Department of Ecology (Ecology) is transmitting comments for the *Tank 241-T-101 Active Ventilation Practicability Evaluation*, RPP-RPT-65234, Revision 0 (Reference 1). Ecology reviewed RPP-RPT-65234 in accordance with the requirements set forth in the Addendum to Agreed Order Docket No. 21304 V.C.1.

Ecology required additional time to complete our review and transmitted letters regarding our continued review of RPP-RPT-65234 (References 2, 3 and 4). Ecology stated we would provide the United States Department of Energy with comments by June 20, 2025 (Reference 4).

Enclosed is the RCR with Ecology's comments. We appreciate your review of these comments and look forward to resolving them at your earliest convenience.

If you have any questions, contact Luissa Johnston, Tank System Operations and Closure Coordinator, at 509-975-1285 or [luissa.johnston@ecy.wa.gov](mailto:luissa.johnston@ecy.wa.gov).

Sincerely,

Digitally signed by Rochette,  
Beth (ECY)  
Date: 2025.06.18 11:54:40  
-07'00'

Elizabeth A. Rochette  
Cleanup Section Manager  
Nuclear Waste Program

lj/bp  
Enclosure

cc: See page 2

References:

1. Letter 25-TWO-0006, dated January 16, 2025, "Submittal of RPP-RPT-65234, 'Tank 241-T-101 Active Ventilation Practicability Evaluation,' Revision 0"
2. Letter 25-NWP-023, dated February 5, 2025, "Extension of the Department of Ecology's Comment Review Period for *Tank 241-T-101 Active Ventilation Practicability Evaluation*, RPP-RPT-65234, Rev. 0, and *Tank 241-T-101 Intrusion Investigation and Intrusion Response Work Plan*, RPP-RPT-65278, Rev. 0"
3. Letter 25-NWP-059, dated April 16, 2025, "Additional Extension of the Department of Ecology's Comment Review Period for *Tank 241-T-101 Active Ventilation Practicability Evaluation*, RPP-RPT-65234, Rev. 0, and *Tank 241-T-101 Intrusion Investigation and Intrusion Response Work Plan*, RPP-RPT-65278, Rev. 0"
4. Letter 25-NWP-078, dated May 20, 2025, "Additional Extension of the Department of Ecology's Comment Review Period for *Tank 241-T-101 Active Ventilation Practicability Evaluation*, RPP-RPT-65234, Rev. 0"

cc electronic w/enc:

Laura Buelow, EPA	Laurene Contreras, YN
Ricky Bang, USDOE	ERWM Staff, YN
Thomas Beam, H2C	Susan Coleman, HAB
Jeremy Belsher, H2C	David Reeploeg, Hanford Communities
James Hamilton, H2C	Max Woods, ODOE
Nick Kirch, H2C	Cathrene Glick, Ecology
Mark Knight, H2C	Edward Holbrook, Ecology
Marc Levitt, H2C	Luissa Johnston, Ecology
Anthony Miskho, H2C	Steve Needles, Ecology
Katie Roberts, H2C	Eric Pierce, Ecology
Rose Russell, H2C	Beth Rochette, Ecology
Karthik Subramanian, H2C	Jonathan Rogers, Ecology
Stephanie Brasher, HMIS	Stephanie Schleif, Ecology
Jon Perry, HMIS	Environmental Portal
Michael Turner, HMIS	Hanford Administrative Record
Teara Farrow Ferman, CTUIR	Hanford Facility Operating Record
Mason Murphy, CTUIR	H2C Correspondence Control
Bambi Rodriguez, CTUIR	HAB Correspondence Control
Anthony Smith, NPT	HMIS Correspondence Control
Alyssa Buck, Wanapum	USDOE Correspondence Control

# Review Comment Record

## Washington State Department of Ecology Nuclear Waste Program

Date: 1/16/2025

Page 1 of 1

**Document Title(s)/Number(s):**

Ecology Comments on T-101 Ventilation Practicability – Primary Document

Document Manager	Telephone Number	Project Manager	Telephone Number	Facility Site ID	Cleanup Site ID
Luissa Johnston					

Item No.	Pg. # Sec. # Para./Sent.	Comment or Question	Modification Needed	Basis/Justification	Permittee Response	Ecology Response	Open/Close	Reviewer Initials
1	Pg. 5, Sec. 3.0	<p>Section states that, due to similarity of evaporation process, only the single-pass ventilation option was evaluated for T-101. However, for B-109 it was found that an effective exhauster flow rate for water evaporation would not trigger air permitting (300 acfm proposed). For T-101, emissions of 1,3-butadiene are assumed to trigger air permitting at a flow rate which would not be effective (~38 cfm).</p> <p>This indicates that there may be enough difference in tank contents (water vs. organics) to reach a different conclusion regarding technological feasibility of organic condensate collection or other controls.</p>	<p>Given the increased organic emissions from T-101, relative to B-109, it appears appropriate to conduct a new analysis of the potential options from a practical standpoint and then determine the potential air permitting implications, rather than assuming that the previous analysis would apply.</p> <p>At a minimum, it would be worthwhile to review whether systems with organic collection, such as a single pass system with condenser or air recirculation with condensate recovery, are technologically feasible in this case. Those organics and any water incidentally collected could also potentially be transported to a sound tank, rather than being placed back into T-101.</p>	WAC 173-400-030(76) and 173-400-110(5)(a)(i)				mfw
2								
3								