STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Richland Field Office
3100 Port of Benton Blvd., Richland, WA 99354 • 509-372-7950

April 9, 2026 26-NWP-044

Ricky Bang, Deputy Assistant Manager
Tank Waste Operations
Hanford Field Office
United States Department of Energy
PO Box 550
Richland, WA 99352

Re: The Department of Ecology's (Ecology) Response to the United States Department of Energy (USDOE) Letter 26-TWO-0014 and Transmittal of Comment Dispositions for the "*Waste Management Area Integration Study – Waste Management Area U*, RPP-PLAN-67088' and the '*Waste Management Area Integration Study – Waste Management Area S-SX*, RPP-PLAN-67087"

References: See page 2

Dear Ricky Bang:

Ecology reviewed *Waste Management Area Integration Study – Waste Management Area U*, RPP-PLAN-67088, Rev. 1 and the *Waste Management Area Integration Study – Waste Management Area S-SX*, RPP-PLAN-67087, Rev. 1 received with the United States Department of Energy (USDOE) (Reference 1). Ecology also reviewed the response to comments USDOE provided for the Revision 0 review of the documents.

Enclosed are the Review Comment Records for both plans with Ecology's responses.

Ecology required additional time to complete our review and notified USDOE by letter 26-NWP-032 (Reference 2), in accordance with Section 9.2 of the *Hanford Federal Facility Agreement and Consent Order*, 89-10, Revision 9.

If you have any questions, please contact Luissa Johnston, Tank Systems Operation and Closure Coordinator, at luissa.johnston@ecy.wa.gov or (509) 975-1285.

Sincerely,

Amie Green
Digitally signed by amgr461@ecy.wa.gov
Date: 2026.04.09 14:38:15 -07'00'

Amie Green
Tank Systems Operation and Closure Project Manager
Nuclear Waste Program

lj/bp
Enclosures

cc: See page 2

References:

1. Letter 26-TWO-0014, dated February 12, 2026, "U.S. Department of Energy, Hanford Field Office Response to Washington State Department of Ecology Comments on RPP-PLAN-67088, 'Waste Management Area Integration Study – Waste Management Area U,' Revision 0, and RPP-PLAN-67087, 'Waste Management Area Integration Study – Waste Management Area S-SX,' Revision 0"
2. Letter 26-NWP-032, dated March 12, 2026, "Extension of the Department of Ecology's (Ecology) Response to the United States Department of Energy (USDOE) Letter 26-TWO-0014 *U.S. Department of Energy, Hanford Field Office Response to Washington State Department of Ecology Comments on RPP-PLAN-67088, Waste Management Area Integration Study – Waste Management Area U'* Revision 0 and RPP-PLAN-67087, Waste Management Area Integration Study – Waste Management Area S-SX, Revision 0"

cc electronic w/enc:

Laura Buelow, EPA
Benjamin Leake, EPA
Michelle Mullin, EPA
Becky Blackwell, USDOE
Robert Irwin, USDOE
Anders Wiborg, USDOE
Katherine Wong, USDOE
Thomas Beam, H2C
Jeremy Belsher, H2C
Christopher Cearlock, H2C
Deanna Klages, H2C
Kearn Lee, H2C
Marc Levitt, H2C
Kliss McNeel, H2C
Md Rahman, H2C
Kathryn Roberts, H2C
Rose Russell, H2C
Karthik Subramanian, H2C
Stephanie Brasher, HMIS
Jon Perry, HMIS
Michael Turner, HMIS
Mason Murphy, CTUIR
Anthony Smith, NPT
Alyssa Buck, Wanapum
Clayton Buck, Wanapum
Laurene Contreras, YN
ERWM Staff, YN
Susan Coleman, HAB
David Reeploeg, Hanford Communities
Max Woods, ODOE
Megan Perkins, WDOH
Jackson Davis, Ecology
Cathrene Glick, Ecology
Amie Green, Ecology
Edward Holbrook, Ecology
Luissa Johnston, Ecology
Steve Needles, Ecology
George Peck, Ecology
Eric Pierce, Ecology
Elizabeth Rochette, Ecology
Stephanie Schleif, Ecology
Noe'l Smith-Jackson, Ecology
John Temple, Ecology
Environmental Portal
Hanford Administrative Record
Hanford Facility Operating Record
H2C Correspondence Control
HAB Correspondence Control
HMIS Correspondence Control
USDOE Correspondence Control

Review Comment Record	Washington State Department of Ecology Nuclear Waste Program	Date: 1/15/2026 DOE Response: 2/12/2026 Ecology Response: 4/9/2026 Page 1 of 6

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

Ecology Comments on RPP-Plan-67087, Rev. 0, S-SX Integration Study - Secondary Document

Document Manager	Telephone Number	Project Manager	Telephone Number	Facility Site ID	Cleanup Site ID
Luissa Johnston	509-975-1285	Amie Green	(509) 316-6873		

Item No.	Pg. # Sec. # Para./Sent.	Comment or Question	Modification Needed	Basis/Justification	Permittee Response	Ecology Response	Open/Close	Reviewer Initials
1.	Multiple locations	The following documents are referenced or listed as references, but missing from the AR on Jan 13, 2026: RPP-PLAN-6577 PNL-4688	Include referenced documents in the AR. If reference to RPP-PLAN-6577, then correct typo.	TPA AP Section 9.4	Accept: The first reference should be "RPP-PLAN-65977". This will be corrected in the document. PNL-4688 can be found at the following link: https://www.osti.gov/biblio/6374757	Accept	Closed	JHD
2.	Pages 2-1 through 2-3 and Appendix A Section 2-1	Proposed regulatory path for all ancillary equipment in that WMA and all the activities to achieve efficient and effective closure of WMA is unclear for cache tanks and ancillary equipment is inadequate for Appendix I.	Include current inventory of cache tanks and ancillary Equipment and MUSTs in Appendix A. Propose or clarify regulatory path for all ancillary equipment in WMA and all the activities to achieve efficient and effective closure of cache tanks, ancillary equipment and MUSTs	TPA AP Appendix I Section 2.1.1	As discussed in Section 4.1, "Regulatory approvals for closure of the tanks and ancillary equipment within the boundary (fence line) of WMA S-SX will follow the tiered closure plan process established in Section 2.2.1 of Appendix I of the HFFACO Action Plan. Under this approach, a single WMA closure action plan (Tier 2 Closure Plan) will be prepared for WMA S-SX, and multiple component closure activity plans (Tier 3 Closure Plans) would be prepared for components or groups of components." For clarity, the following language will be deleted from the Integration Study: ~~"Two or more component closure plans are recommended for WMA S-SX ancillary equipment. Separating the ancillary equipment into two groups, those that contain waste and those that do not, will facilitate incremental closure. The ancillary equipment that does not contain waste (e.g., valve boxes, diversion boxes, encasements) can be closed prior to the equipment that will be subject to characterization and residual (e.g., catch tanks)."~~ The deleted text will be replaced with the following language:	Provide Ecology with ID and current volume and characterization data for S-SX catch tank mentioned on page A-6. Provide component ids volume and characterization data for any other S-SX ancillary equipment. This is an official document request pursuant to DOE's duty to provide information for this TSD unit transmitted by signed letter, on an RCR form, per Ecology's Rev. 8c records request process.	Open	JHD

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					"The WMA S-SX Tier 2 closure plan will identify groupings of component closure activities and the schedule of development for the Tier 3 closure plans in accordance with HFFACO Milestone M-045-119." Furthermore, inventory of structures, systems, and components that are associated with WMA S-SX are provided in Section 2.2.1, 'Waste Management Area S-SX Information," and summarized in Section A3.0 of Appendix A.			
3.	Page 2-4 Section 2.1.2	Text does not address that contamination originating from WMA S-SX, particularly Chromium (a designated dangerous waste for WMA S-SX) , has impacted the groundwater beneath WMA S-SX as described in the 2024 RCRA Annual Groundwater Report DOE-RL-2024-29-R0. As such this identifies that the contamination has extended full depth through the Vadose Zone and into the groundwater.	Include text identifying Chromium, a dangerous waste originating from WMA S-SX has extended full depth through the Vadose Zone and into the groundwater and impacted groundwater beneath WMA S-SX.	Clarification of known soil and groundwater contamination at WMA S-SX.	Although groundwater monitoring is briefly discussed, Section 2.1.2 focuses on waste and soil characterization, not groundwater contamination. Groundwater contamination is assessed in the risk evaluation for the 200-UP-1 groundwater OU. No change to the document.	Accept	Close	CDG
4.	Page 2-4 Section 2.1.2	Section cites SGW-60577, Engineering Evaluation Report for Single-Shell Tank Waste Management Area S-SX Groundwater Monitoring for proposed final status groundwater monitoring but does not address the subsequent changes to groundwater flow directions from the groundwater extraction wells located downgradient of WMA S-SX.	Include text to address the subsequent changes to groundwater flow directions from the groundwater extraction wells located downgradient of WMA S-SX.	Clarification of known groundwater flow characteristics at WMA S-SX.	The purpose of this section is to identify current reports that support groundwater characterization and on-going monitoring. Additional detail on subsequent changes to groundwater flow directions from the groundwater extraction wells located downgradient of WMA S-SX are discussed in the annual RCRA groundwater monitoring reports (e.g., DOE/RL-2024-29, *Hanford Site RCRA Groundwater Monitoring Report for 2024*). No change to the document.	Accept	Close	CDG

Item No.	Pg. # Sec. # Para./Sent.	Comment or Question	Modification Needed	Basis/Justification	Permittee Response	Ecology Response	Open/Close	Reviewer Initials
5.	Page 2-4 Section 2.2 Line 46	Regarding citation of WMA S-SX Phase 2 RFI/CMS Work Plan (RPP-PLAN-65977): ECY has open comments in the RCR for RPP-PLAN-65997, Rev. 0, Phase 2 RFI/CMS Work Plan for WMA S-SX (ECY letter 25-NWP-171, Oct. 16, 2025), including comments on Section 4.7 that refer back to the principles and parameters document (DOE/RL-2019-46). ECY acknowledges that DOE has requested and been granted an RCR comment review extension in ECY letter 25-NWP-226, Dec. 23, 2025).	Suggest adding text explaining that there are open comments pending for RPP-PLAN-65997, Rev. 0, Phase 2 RFI/CMS Work Plan.	Open comments in the RCR for WMA S-SX Phase 2 RFI/CMS Work Plan, Rev.0 (RPP-PLAN-65997)	We acknowledge there are open comments on the work plan (RPP-PLAN-65977), however the integration study does not need to be revised to incorporate this information. No change to the document.	Accept. (GWP 2-26-2026). Applying Figure I-1 in Appendix I of the TPA Action Plan, the Integration Study precedes (by arrow direction) the WMA RFI / CMS Work Plan.	Close	GWP
6.	Page 2-6 Figure 2-1 Page 2-7 Figure 2-2	Figures depict Vadose Zone Soil Conceptual Site Model and text states “partial thickness VZ contamination” which is incorrect as it is known that dangerous waste Chromium has been identified in the groundwater beneath WMA S-SX and WMA S-SX has been identified as a contributing source. As such this identifies that the contamination has extended full depth through the Vadose Zone and into the groundwater.	Correct text and figures to identify dangerous waste originating from WMA S-SX has extended full depth through the Vadose Zone and into the groundwater and impacted groundwater beneath WMA S-SX.	Clarification of known soil and groundwater contamination at WMA S-SX.	Figures 2-1 and 2-2 are sourced directly from RPP-PLAN-65977, *Phase 2 RCRA Facility Investigation/Corrective Measures Study Work Plan for Waste Management Area S-SX* (Figures 4-9 and 4-10, respectively). For consistency with RPP-PLAN-65977, no change to the document.	Accept	Close	CDG
7.	Page 3-2 and 3-3 Section 3.1.1	WMA S-SX does not currently have a landfill determination. Therefore, where the use of DOE/RL-2019-46, *Central Plateau Inner Area Cleanup Principles and Parameters* is inconsistent with WAC 173-303, Ecology will use WAC 173-303. For WMA S-SX, Ecology will use WAC 173-303-610(2) Closure Performance Standard, and cited regulations therein for closure performance standards.	The outcome of ECY legal review and of current DOE-HFO / Ecology TPA and CD Meeting Action Items may influence the way the text on page 3-2 and 3-3 is worded where it refers to DOE/RL-2019-46. ECY suggests the following text be added near the end of Section 3.1.1 on page 3-3: “Initiation of ECY legal review of DOE/RL-2019-46 in 2025 and current DOE-HFO / Ecology TPA and CD Meeting Action Items are acknowledged, including questions being raised about assumptions of WMA closure, WMA landfill determination, and absence of any legal review during the DOE/RL-2019-46 review and approval process.”	Ecology letter 19-NWP-090	The text included in Section 3.1.1 discusses the overall objectives of DOE/RL-2019-46 and does not discuss landfill or clean closure decisions with respect to WMA S-SX. No change to the document.	Reject. As stated in Letter 19-NWP-090, “Permitting decisions … for single-shell tank waste management areas will be made on a case-by-case basis…”. WMA S-SX does not currently have a landfill determination. Replace the last paragraph of p. 3-2 and remaining paragraphs of	Open	GWP

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						section 3.1.1 on p. 3-3 with "For closure of SST WMAs, to address nonradionuclides, the WAC 173-303-610 clean closure performance standards for contaminated soils are MTCA Method B cleanup levels. However, if landfill closure is chosen for WMA S-SX based on a certified practicability demonstration that clean closure is not practicable, and is deemed acceptable after considering data from vadose zone sampling, tank and ancillary equipment sampling, and groundwater monitoring, then MTCA Method C direct contact levels are appropriate for contaminated soils left in place, in accordance with WAC 173-303-64620."		
8.	Page 3-4 3.1.2.1 3rd Paragraph	Discussion of DOE/ORP-2014-02 is misleading with regards to its regulatory status and DOE's efforts to resolve outstanding issues, most notably the requirement make this demonstration	Include references to regulator letters and outstanding concerns that limit applicability to these unit, including: 15-NWP-103 15-NWP-149	WAC 173-303-640(8)(b) WAC 173-303-610	Two sentences in the paragraph will be modified as follows: "DOE submitted DOE/ORP-2014-02, *Clean Closure Practicability Demonstration for the*	Permit requirements will be made clear through the permitting process	Close	JHD

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		(WAC 173-303-640(8)(b) is a closure plan requirement and that the demonstration and modified closure plans must be submitted to Ecology as such (15-NWP-103). Sentence states: "It is assumed that DOE/ORP-2014-02 will also be approved for WMA S-SX, so it will be closed as a landfill."	19-NWP-090 Statement that DOE/ORP-2014-02-SUPP1was submitted to Ecology in 2014 should be corrected to state 2019. Suggested change: "Ecology is reviewing DOE/ORP-2014-02 to approve WMA S-SX for landfill closure (see 15-NWP-103, 15-NWP-149, and 19-NWP-090)."		*Single-Shell Tanks* and DOE/ORP-2014-02-SUPP1, *Supplemental Information to the Clean Closure Practicability Demonstration for the Single Shell Tanks* to Ecology in 2014 and 2019, respectively. "~~Ecology approved DOE/ORP-2014-02 for WMA C on June 12, 2019 and agreed that clean closure of WMA C is not practicable. It is assumed that DOE/ORP-2014-02 will also be approved for WMA S-SX, so it will be closed as a landfill~~ used to make a landfill determination for WMA S-SX.			
9.	Page 3-8 Section 3.1.6 Lines 7-11, 31-39	Text states that "A draft WIR Determination for residual radioactive wastes at WMA C is documented in DOE/ORP-2018-01 *Draft Waste Incidental to Reprocessing Evaluation for Closure of Waste Management Area C at the Hanford Site*…" but that "…a final WIR Determination for WMA C has not been issued." and that "…it is assumed that the same process used for WMA C will be used for WMA S-SX…" ECY submitted comments (Letter 18-NWP-181, Nov. 6, 2018) on the DOE Draft WIR Evaluation for Closure of WMA C, DOE/ORP-2018-01, Draft D. Letter 18-NWP-181 highlighted many concerns. Notably, ECY found that "…the United States Department of Energy (USDOE) is unable to show compliance with the three criteria of the waste incidental to reprocessing evaluation process set forth in Chapter II of the Radioactive Waste Management Manual, DOE M 435.1-1." Additionally, ECY expressed concerns that "…USDOE submitted the Draft WIR Evaluation to the Nuclear Regulatory Commission without any evaluation of the contaminated soil surrounding the tanks, in violation of the	In light of the many issues brought forward in the ECY review of the Draft WIR Evaluation for WMA C (Letter 18-NWP-181) and no record of the DOE addressing these many issues, ECY questions the assumption that "…the same process used for WMA C will be used for WMA S-SX…" ECY suggests deletion of reference to the WMA C draft WIR and any assumptions being made regarding it in this WMA S-SX Integration Study.	Ecology letter 18-NWP-181	The following text will be deleted: "~~A draft WIR Determination for residual radioactive wastes at WMA C is documented in DOE/ORP-2018-01, Draft Waste Incidental to Reprocessing Evaluation for Closure of Waste Management Area C at the Hanford Site. A technical review of DOE/ORP-2018-01 was performed by the U.S. Nuclear Regulatory Commission, and comments were invited from the States, Tribal Nations, and the public; however, a final WIR Determination for WMA C has not been issued. Although a WIR Determination has not yet been made for the residual radioactive wastes that may remain in WMA S-SX after retrieval, it is assumed that the same process used for WMA C will be used for WMA S-SX, with incorporation of lessons learned from WMA C closure.~~	Accept (GWP 2-26-2026).	Close	GWP

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		Hanford Federal Facility Agreement and Consent Order (HFFACO).”						

Review Comment Record	Washington State Department of Ecology Nuclear Waste Program	Date: 1/15/2026 DOE Response: 2/12/2026 Ecology Response: 4/9/2026 Page 1 of 5

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

Ecology Comments on RPP-Plan-67088, Rev. 0, U Integration Study - Secondary Document

Document Manager	Telephone Number	Project Manager	Telephone Number	Facility Site ID	Cleanup Site ID
Luissa Johnston	509-975-1285	Amie Green	(509) 316-6873		

Item No.	Pg. # Sec. # Para./Sent.	Comment or Question	Modification Needed	Basis/Justification	Permittee Response	Ecology Response	Open/Close	Reviewer Initials
1.	Whole document	The following documents are referenced or listed as references, but missing from the AR as of Jan 13, 2026: WHC-SD-WM-TI-648 HNF-SD-WM-ER-325	Include referenced documents in the AR. If reference to RPP-PLAN-6577, then correct typo.	TPA AP Section 9.4	WHC-SD-WM-TI-648 – a link to this document is provided on page 9-9 HNF-SD-WM-ER-325 – a link to this document is provided on page 9-6 No change to the document.	Accept	Close	JHD
2.	General Info	What is plan for settling tank 241-U-361	No changes. Please clarify.		The 241-U-361 Settling Tank is associated with U-Plant and will be addressed as part of the 200-WA-1 Operable Unit. No change to the document.	Accept	Close	JHD
3.	Page 2-1 through 2-3 and Appendix A Section 2-1	Proposed regulatory path for all ancillary equipment in WMA and all the activities to achieve efficient and effective closure of WMA is unclear for cache tanks and ancillary equipment is inadequate for Appendix I	Include current inventory of cache tanks and ancillary Equipment and MUSTs in Appendix A. Propose or clarify regulatory path for all ancillary equipment in WMA and all the activities to achieve efficient and effective closure of cache tanks, ancillary equipment and MUSTs	TPA AP Appendix I Section 2.1.1	As discussed in Section 4.1, "Regulatory approvals for closure of the tanks and ancillary equipment within the boundary (fenceline) of WMA U will follow the tiered closure plan process established in Section 2.2.1 of Appendix I of the HFFACO Action Plan. Under this approach, a single WMA closure action plan (Tier 2 Closure Plan) will be prepared for WMA U, and multiple component closure activity plans (Tier 3 Closure Plans) would be prepared for components or groups of components. For clarity, the following language will be deleted from the Integration Study: ~~Two or more component closure plans are recommended for WMA U ancillary equipment. Separating the ancillary equipment into two groups, those that contain waste and those that do not, will facilitate incremental closure. The ancillary equipment that does not contain waste (e.g., valve boxes, diversion boxes, encasements) can be closed prior to the equipment that will be subject to~~	Provide Ecology with component ids, volume and characterization data for all WMA U piping ancillary equipment. Provide Ecology with solid waste determination and sample data supporting that decision for waste in 2607-WUT septic tank along with sample data supporting decision. If applicable provide waste inventory and designation. Provide Ecology with IDs inventory and characterization for any vaults and catch	Open	JHD

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					~~characterization and residual waste disposition (e.g., catch tank/IMUST).~~" The deleted text will be replaced with the following language: "The WMA U Tier 2 closure plan will identify groupings of component closure activities and the schedule of development for the Tier 3 closure plans in accordance with HFFACO Milestone M-045-114." Furthermore, inventory of structures, systems, and components that are associated with WMA U are provided in Section 2.2.1, 'Waste Management Area U Information," and summarized in Section A3.0 of Appendix A.	tanks. If vault and catch tanks are known to be empty, provide most recent visual or camera inspection records. This is an official document request pursuant to DOE's duty to provide information for this TSD unit transmitted by signed letter, on an RCR form, per Ecology's Rev. 8c records request process.		
4.	Page 2-5/2-6 Section 2.1.2	Text does not address that contamination originating from WMA U, particularly Chromium (a designated dangerous waste for WMA U) , has impacted the groundwater beneath WMA U as described in the 2024 RCRA Annual Groundwater Report DOE-RL-2024-29-R0. As such this identifies that the contamination has extended full depth through the Vadose Zone and into the groundwater.	Include text identifying Chromium, a dangerous waste originating from WMA U has extended full depth through the Vadose Zone and into the groundwater and impacted groundwater beneath WMA U.	Clarification of known soil and groundwater contamination at WMA U.	Although groundwater monitoring is briefly discussed, Section 2.1.2 focuses on waste and soil characterization, not groundwater contamination. Groundwater contamination is assessed in the risk evaluation for the 200-UP-1 groundwater OU. No change to document.	Accept	Close	CDG
5.	Page 2-6 Section 2.2 Line 14	Regarding citation of WMA U Phase 2 RFI/CMS Work Plan (RPP-PLAN-66053): ECY has open comments in the RCR for RPP-PLAN-66053, Rev. 0, Phase 2 RFI/CMS Work Plan for WMA U (ECY letter 25-NWP-191, Oct. 30, 2025), including comments on Section 4.7 that refer back to the principles and parameters document (DOE/RL-2019-46).	Suggest adding text explaining that there are open comments pending for RPP-PLAN-66053, Rev. 0, Phase 2 RFI/CMS Work Plan.	Open comments in the RCR for WMA U Phase 2 RFI/CMS Work Plan, Rev.0 (RPP-PLAN-66053)	We acknowledge there are open comments on the work plan (RPP-PLAN- 66053), however the integration study does not need to be revised to incorporate this information. No change to document.	Accept. (GWP 2-26-2026). Applying Figure I-1 in Appendix I of the TPA Action Plan, the Integration Study precedes (by arrow direction) the WMA RFI / CMS Work Plan.	Close	GWP

Item No.	Pg. # Sec. # Para./Sent.	Comment or Question	Modification Needed	Basis/Justification	Permittee Response	Ecology Response	Open/Close	Reviewer Initials
6.	Page 2-7 Figure 2-2	Figure depicts Vadose Zone Soil Conceptual Site Model and text states "potential for full-thickness VZ contamination" which is incorrect as it is known that dangerous waste Chromium has been identified in the groundwater beneath WMA U and WMA U has been identified as a contributing source. As such this identifies that the contamination has extended full depth through the Vadose Zone and into the groundwater.	Correct text and figure to identify dangerous waste originating from WMA U has extended full depth through the Vadose Zone and into the groundwater and impacted groundwater beneath WMA U.	Clarification of known soil and groundwater contamination at WMA U.	Figure 2-2 is sourced directly from RPP-PLAN-66053, *Phase 2 RCRA Facility Investigation/Corrective Measures Study Work Plan for Waste Management Area U* (Figure 4-8). For consistency with RPP-PLAN-66053, no change to the document.	Accept	Close	CDG
7.	Page 2-7 Figure 2-2	Text on Figure indicates "Main Contaminants" including Tech-99 and Nitrate however Chromium, an identified and known dangerous waste for WMA U, which is in the groundwater beneath WMA U and identified WMA U as a contributing source.	Include text identifying Chromium, a dangerous waste originating from WMA U	Clarification of known soil and groundwater contamination at WMA U.	See response to Comment #6.	Accept	Close	CDG
8.	Page 3-2 and 3-3 Section 3.1.1	WMA U does not currently have a landfill determination. Therefore, where the use of DOE/RL-2019-46, *Central Plateau Inner Area Cleanup Principles and Parameters* is inconsistent with WAC 173-303, Ecology will use WAC 173-303. For WMA U, Ecology will use WAC 173-303-610(2) Closure Performance Standard, and cited regulations therein for closure performance standards.	The outcome of ECY legal review and of current DOE-HFO / Ecology TPA and CD Meeting Action Items may influence the way the text on page 3-2 and 3-3 is worded where it refers to DOE/RL-2019-46. ECY suggests the following text be added near the end of Section 3.1.1 on page 3-3: "Initiation of ECY legal review of DOE/RL-2019-46 in 2025 and current DOE-HFO / Ecology TPA and CD Meeting Action Items are acknowledged, including questions being raised about assumptions of WMA closure, WMA landfill determination, and absence of any legal review during the DOE/RL-2019-46 review and approval process."	Ecology letter 19-NWP-090	The text included in Section 3.1.1 discusses the overall objectives of DOE/RL-2019-46 and does not discuss landfill or clean closure decisions with respect to WMA U. No change to the document.	Reject. As stated in Letter 19-NWP-090, "Permitting decisions … for single-shell tank waste management areas will be make on a case-by-case basis…". WMA U does not currently have a landfill determination. Replace the last paragraph of p. 3-2 and remaining paragraphs of section 3.1.1 on p. 3-3 with "For closure of SST WMAs, to address nonradionuclides, the WAC 173-303-610 clean	Open	GWP

Item No.	Pg. # Sec. # Para./Sent.	Comment or Question	Modification Needed	Basis/Justification	Permittee Response	Ecology Response	Open/Close	Reviewer Initials
						closure performance standards for contaminated soils are MTCA Method B cleanup levels. However, if landfill closure is chosen for WMA S-SX based on a certified practicability demonstration that clean closure is not practicable, and is deemed acceptable after considering data from vadose zone sampling, tank and ancillary equipment sampling, and groundwater monitoring, then MTCA Method C direct contact levels are appropriate for contaminated soils left in place, in accordance with WAC 173-303-64620."		
9.	Page 3-4 Section 3.1.2.1	Discussion of DOE/ORP-2014-02 is misleading with regards to its regulatory status and DOE's efforts to resolve outstanding issues, most notably the requirement make this demonstration (WAC 173-303-640(8)(b)) is a closure plan requirement and that the demonstration and modified closure plans must be submitted to Ecology as such (15-NWP-103).	Include references to regulator letters and outstanding concerns that limit applicability to these unit, including: 15-NWP-103 15-NWP-149 19-NWP-090 Statement that DOE/ORP-2014-02-SUPP1was submitted to Ecology in 2014 should be corrected to state 2019.	WAC 173-303-640(8)(b) WAC 173-303-610	Two sentences in the paragraph will be modified as follows: "DOE submitted DOE/ORP-2014-02, *Clean Closure Practicability Demonstration for the Single-Shell Tanks* and DOE/ORP-2014-02-SUPP1, *Supplemental Information to the Clean Closure Practicability Demonstration for the Single Shell Tanks* to Ecology in 2014 and 2019, respectively. "~~Ecology approved DOE/ORP-2014-02 for~~	Permit requirements will be made clear through the permitting process	Close	JHD

Item No.	Pg. # Sec. # Para./Sent.	Comment or Question	Modification Needed	Basis/Justification	Permittee Response	Ecology Response	Open/Close	Reviewer Initials
		Sentence states: "It is assumed that DOE/ORP-2014-02 will also be approved for WMA S-SX, so it will be closed as a landfill."	Suggested change: "Ecology is reviewing DOE/ORP-2014-02 to approve WMA S-SX for landfill closure (see 15-NWP-103, 15-NWP-149, and 19-NWP-090)."		~~WMA C on June 12, 2019 and agreed that clean closure of WMA C is not practicable. It is assumed that DOE/ORP-2014-02 will also be approved for WMA U, so it will be closed as a landfill~~ used to make a landfill determination for WMA U.			
10.	Page 3-8 Section 3.1.6 Lines 7-12, 33-40	Text states that "A draft WIR Determination for residual radioactive wastes at WMA C is documented in DOE/ORP-2018-01 *Draft Waste Incidental to Reprocessing Evaluation for Closure of Waste Management Area C at the Hanford Site*…" but that "…a final WIR Determination for WMA C has not been issued." and that "…it is assumed that the same process used for WMA C will be used for WMA S-SX…" ECY submitted comments (Letter 18-NWP-181, Nov. 6, 2018) on the DOE Draft WIR Evaluation for Closure of WMA C, DOE/ORP-2018-01, Draft D. Letter 18-NWP-181 highlighted many concerns. Notably, ECY found that "…the United States Department of Energy (USDOE) is unable to show compliance with the three criteria of the waste incidental to reprocessing evaluation process set forth in Chapter II of the Radioactive Waste Management Manual, DOE M 435.1-1." Additionally, ECY expressed concerns that "…USDOE submitted the Draft WIR Evaluation to the Nuclear Regulatory Commission without any evaluation of the contaminated soil surrounding the tanks, in violation of the Hanford Federal Facility Agreement and Consent Order (HFFACO)."	In light of the many issues brought forward in the ECY review of the Draft WIR Evaluation for WMA C (Ecology letter 18-NWP-181) and no record of the DOE addressing these many issues, ECY questions the assumption that "…the same process used for WMA C will be used for WMA S-SX…" ECY suggests deletion of reference to the WMA C draft WIR and any assumptions being made regarding it in this WMA S-SX Integration Study.	Ecology letter 18-NWP-181	The following text will be deleted: "~~A draft WIR Determination for residual radioactive wastes at WMA C is documented in DOE/ORP-2018-01, Draft Waste Incidental to Reprocessing Evaluation for Closure of Waste Management Area C at the Hanford Site. A technical review of DOE/ORP-2018-01 was performed by the U.S. Nuclear Regulatory Commission, and comments were invited from the States, Tribal Nations, and the public; however, a final WIR Determination for WMA C has not been issued. Although a WIR Determination has not yet been made for the residual radioactive wastes that may remain in WMA U after retrieval, it is assumed that the same process used for WMA C will be used for WMA U, with incorporation of lessons learned from WMA C closure~~."	Accept (GWP 2-26-2026).	Close	GWP