STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Richland Field Office
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June 11, 2026 26-NWP-080

Ricky Bang, Deputy Assistant Manager
Tank Waste Operations
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 *241-A-103 Tank Waste Retrieval Work Plan* (TWRWP), RPP-PLAN-65683, Rev. 0

Reference: See page 2

Dear Ricky Bang:

The Department of Ecology (Ecology) has reviewed RPP-PLAN-65683, *241-A-103 Tank Waste Retrieval Work Plan*, Rev. 0 received with the United States Department of Energy (USDOE) Letter 26-TWO-0030 (Reference). Ecology's RCR comments are enclosed.

The RCR comments are from Ecology's review of the draft of RPP-PLAN-65683. Some comments have been closed, but most remain open. Ecology is open to meeting with USDOE to resolve the open comments as we work towards approval.

If you have any questions or concerns, 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: 2026.06.11 09:26:19 -07'00'

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

lj/bp
Enclosure

cc: See page 2

Reference: Letter 26-TWO-0030, dated April 29, 2026, “U.S. Department of Energy, Hanford Field Office Submittal of RPP-PLAN-65683, ‘241-A-103 Tank Waste Retrieval Work Plan,’ Revision 0”

cc electronic:

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Stephanie Schleif, 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: Permittee transmitted Draft - 8/7/2025 Ecology transmitted RCR – 9/11/2025 Permittee Response – 11/4/2025 Ecology Response – 12/1/2025 Permittee Response and Redline – 1/22/2026 Ecology Response – 2/11/2026 Permittee Response – 4/29/2026 Ecology Response – 6/11/2026 Page 1 of 39

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

Ecology Comments on ~~draft~~ RPP-Plan-65683, Rev. 0, A-103 Tank Waste Retrieval Work Plan

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.	Page 2-7 1st Paragraph 2nd Sentence	"The tank received residual evaporator liquor…" Is "liquor" supposed to be "liquid"	Possibly modification of spelling.	Clarification of spelling	Liquor was used intentionally to imply that liquid has been concentrated.	12/1/2025: Accept	Close	LJ
2.	Page 2-8 1st Paragraph 2nd Sentence	"A post-retrieval sample will be taken of the residual waste for all constituents identified in the Ecology-approved sampling and analysis plan…" Which sample and analysis plan is this referring to? Has Ecology already approved a sampling and analysis plan for this?	Clarify what sampling and analysis plan this is referring to and if it has already been approved by Ecology	Clarification of document referenced	A post retrieval sampling plan has not been developed yet since the post retrieval conditions are unknown. In the past, the plan was developed in conjunction with Ecology but it was recently pointed out that there is no requirement for Ecology approval. The following changes are planned. "A post-retrieval sample will be taken of the residual waste for all constituents identified in the post retrieval sampling and analysis plan that will be developed when post retrieval conditions are known, pursuant to the requirements of that sampling and analysis plan, to address the uncertainties. The information on risk and hazard values for future closure actions will be derived from post-retrieval sampling." 4/24/26--RPP-PLAN-23827, Sampling and Analysis Plan for Single-Shell Tanks Component Closure, has been completed. A TSAP will be prepared after retrieval is complete. A global (SST-wide) SAP has been developed as part of the DQO process that	12/1/2025: Accept in concept. Comment remains open pending receipt of SAP. 2/11/2026: Reject. Appendix I Section 21.6 states "Before tank waste field retrieval activities are initiated, DOE will develop a tank or component specific retrieval data quality objectives (DQO) document for the residual tank waste characterization in coordination with Ecology. As part of the DQO process, DOE will also develop a sampling and analysis plan for post-retrieval and closure sampling." This suggests that a tank specific SAP would be developed prior to retrieval. Permittee response suggests the tank specific SAP would be developed after retrieval "when post retrieval conditions are known" which is	Close	LJ

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					meets the requirements of the TPA and Appendix I referenced by Ecology. The development and use of global (SST-wide) DQOs and SAPs to facilitate retrieval was agreed upon and established collaboratively with Ecology in 2004 and 2005 (see TPA Quarterly Milestone Review Meeting Minutes, November 16, 2004, approved February 1, 2005, Accession D7346787; TPA Quarterly Milestone Review Meeting Minutes, February 22, 2005, approved June 28, 2005, Accession DA506389). Revision 0 of RPP-23403, DQO for SST Component Closure, was issued in 2005 consistent with that agreement, and describes the DQO process "to support the component closure activities for all SSTs." Subsequent revisions of RPP-23403 continue to reflect this agreed-upon framework. RPP-PLAN-23877 sets forth the global (SST-wide) SAP, also as agreed upon in 2004 as the path forward for SSTs. The development and use of the SST-wide DQO and SAP, followed by later development and use of TSAPs, has been the long-standing agreement between HFO and Ecology, as memorialized in the Quarterly Milestone Review Meeting Minutes referenced above. Furthermore, TWRWPs related to C-Farm, AX-Farm, and other A-Farm tanks (A-101 and A-102), which reference the same SST-wide DQO and SAP, have previously been approved by Ecology, consistent with the agreed-upon approach.	counter to the TPA Appendix I Section 21.6. 6/11/2026: Ecology is willing to close out this comment as it was answered in the original response. However, Ecology does want to point out that the Quarterly Milestone Review Meeting Minutes where supposed agreements were made and "long-standing agreement" memorialized do not highlight any agreements, they allude to plans that are in preparation to be transmitted to Ecology for review. These meeting minutes were from 2004 and 2005. Since then, the SST Component Closure DQO and SST Component Closure SAP have gone through multiple revisions. Also, the TWRWPs related to C-Farm cannot be compared to A-AX, that was an entirely different farm. As for the previous approved TWRWPs for A-AX farm, those were approved before we encountered the problems with the stiffener rings in tank AX-101 which brought to light new data quality issues that are referenced in comment 3 below.		

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3.	Page 2-8 2nd Paragraph	This document references and relies on generic data quality objectives which have not been updated through established EPA Data Quality Assessment procedures, and in some ways have deviated from agreements made with Ecology to meet TPA requirements in terms of inventory calculation and efforts to achieve representative sampling. A greater concern is that the tank specific DQO has not been developed to address tank specific data gaps, and the response to Item 2 indicates a sample analysis plan is not even in the works. There is considerable room to improve accuracy of inventory and data quality to support closure based on the results of prior retrievals. The location and nature of residual solids cast serious doubt on the assumption that post retrieval sampling alone can accurately reflect the residual waste inventory. For example, RPP-RPT-64992 showed that 280 cu.ft. of the 687 cu.ft. residual solids were on walls, rings, and airlift circulators which were unreachable by one or both retrieval technologies, and even with correct statistical methods, would represent only the portion of waste on the floor that is accessible to post retrieval sampling. There should be mounting concern by all parties whether the data gathered under this process will be adequate for closure, even as a landfill, because you cannot effectively monitor for releases from a regulated unit, if the waste in it was never characterized.	In accordance with Appendix I, prior to retrieval, in collaboration with Ecology, DOE must develop a tank specific DQO and Sample Analysis Plan which closes gaps between what a tank storage TSDF operating to interim status standards is required to know about the waste they store (Item 10) and whether that knowledge is sufficient to reliably substitute for direct testing of the waste. Collaboration is needed because the goal of this process is to submit a certified Type III closure plan concurrent with the Retrieval Data Report and the DQO process exists to ensure enfranchisement of both the regulators and the facility.		4/24/26--Sufficient data exists to allow for the design and deployment of retrieval equipment. Retrieval activities will change the volume, characteristics, and concentrations of the waste in A-103 so sampling prior to retrieval and developing sampling plans without knowledge of the final conditions is not warranted. As noted in Permittee's previous response, a separate TSAP specific to post-retrieval sampling will be prepared once post-retrieval conditions are known. That TSAP will document operational sampling and analysis requirements and work instructions and meet requirements in the overarching SAP. The TSAP will also be provided to Ecology for information prior to sample collection. In addition, see Response to Comment 2, above. The development and use of the SST-wide DQO and SAP to facilitate retrieval, and later development and use of TSAPs, has been the long-standing agreement between HFO and Ecology.	6/11/2026: In accordance with Appendix I, prior to retrieval, in collaboration with Ecology, DOE must develop a tank specific DQO and Sample Analysis Plan which closes gaps between what a tank storage TSDF operating to interim status standards is required to know about the waste they store (Item 10) and whether that knowledge is sufficient to reliably substitute for direct testing of the waste. There is no other agreement.	OPEN	JHD

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4.	Page 2-8 2nd Paragraph	The latest version of the SST Component Closure Data Quality Objective and Sample and Analysis Plan referenced here are still in comment dispositions.	Resolution of comment dispositions for documents referenced in the TWRWPS.	Ecology would like to resolve open comments for these documents soon as they are actively referenced in TWRWPS.	Okay. The "latest revision" is the citation in the references section.	12/1/2025: Accept	Close	LJ
5.	Page 2-8 Section 2.2 1st Paragraph 3rd Sentence	"There are no other known pathways into the tank; should any be discovered, they will be isolated during retrieval system installation or in accordance with the tank closure plan"	Requesting clarification if there is a tank closure plan as referenced at the end of this sentence.	Clarification on tank closure plan referenced in this sentence.	As required by Appendix I 2.2.1 a closure plan is required for "closure of individual SSTs". A closure plan has not been written for A-103 but one will be as required and will address intrusion pathways that are discovered. Milestone M-045-103 requires WMA A/AX Tier 2 Closure Plan and a schedule for Tier 3 Closure plans by 9/30/26.	12/1/2025: Accepted pending additional clarification request: if a pathway is discovered during retrieval, it would be isolated then. Otherwise if a pathway is discovered post-retrieval, it would be isolated in accordance with the tank closure plan? 2/11/2026: Accept	Close	LJ
6.	Page 3-1 Section 3 1st Paragraph	From the descriptions of the "technologies" to be applied to remove the waste materials there seems to be little difference from what is described as the 1st technology: sluicing with water and sluicing with water with supernate, and what is described as the 2nd technology: high pressure water since it appears that all three methodologies will be used intermixed and repeatedly applied without clarification when either "technology" is accomplished.	Clarify when and how each different technology method will be used and how it will be determined that one or the other technology is completed.	Clarification of technologies.	Retrieval experience has shown that the waste is not always uniform vertically or laterally. Occasionally hard monolithic structures have been found below risers after the surface waste has been removed. Retrieval is most efficient when the needed tool is used at the needed time rather than using one technology until no waste is being retrieved. Another example is with salt cake dissolution. The salt dissolves more quickly when it is in small pieces creating more surface area for the water to interact with, so it is better to use high pressure water to break apart agglomerates so dissolution is quicker. There is significant difference between the technologies. Sluicing with water occurs at about 100 gpm and about 180 psi. High pressure water is 5,000 psi and 10 gpm. Supernate sluicing allows for slow suspension of solids without impacts to DST space. The higher specific gravity supernate lifts more solids to the pump	12/1/2025: Accept	Close	CDG

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					suction (a good example of this is how well a person floats in the Great Salt Lake or Dead Sea compared to just water). The first retrievals in C Farm only included sluicing with supernate. Additonal equipment was added to allow for water and high pressure water. The current ERSS makes all three options available when needed but that does not mean they are not different technologies.			
7.	Page 3-1 Section 3 1st Paragraph 2nd and 3rd Sentence	What is the difference between water and high-pressure water? Is there a document that describes in more detail how water and supernate sluice differ from high pressure water?	Add a reference to the document or add it to this TWRWP how water and supernate sluicing differ from high-pressure water. How much pressure difference is there between water and supernate sluicing compared to high-pressure water.	Clarification of technologies.	See above. As stated in section 3.5, process flow diagrams will be provided with the IQRPE package of drawings.	12/1/2025: Accept	Close	LJ
8.	Page 3-1 and 3-2 Section 3.1.1	How is it determined when sluicing with supernate is needed? Will the same equipment be used for both technologies? Or do any modifications need to be made between switching of technologies?	See comment	Clarification of technologies.	The amount of retrieved waste is tracked. Normally, each time an operating period is completed and waste is transferred to the receiving DST an estimate is made of the amount of waste retrieved. When little or no waste is retrieved with the retrieval methods used adjustments are made. One of the adjustments that can be made is to use supernate for sluicing. Valve line ups are needed to switch between the different technologies. For supernate sluicing, the supernate pump in the DST is used along with the supernate transfer line.	12/1/2025: Accept pending response added to document 2/11/2026: Accept/ tied to 16	Close	LJ
9.	Page 3-2 1st Paragraph	Text reads “The waste in tank A-103 is mostly saltcake, so water will be used to sluice and dissolve the waste and supernate will be used as the secondary sluicing liquid when needed. The WRS will have the capability to use high	Clarify when and how each different technology method will be used and how it will be determined that one or the other technology is completed.	Clarification of technologies.	See response to comment 5 above.	12/1/2025: Accept; also note that the comment referenced in Permittee Response is now 6.	Close	CDG

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		pressure water to break apart hard agglomerations of waste. The WRS will also have the capacity to use hot or cold water for sluicing." It is unclear when one technology is completed and a second technology is then applied as it appears they are intended to intermix and there is no						
10.	Page 3-5 Paragraph 3	Plan states that 'Meeting the informational requirements for waste transfers meets the requirements of Washington Administrative Code (WAC) 173-303-300, "General Waste Analysis."' Then lists those as sources the DST WAP and a "waste profile sheet", neither of which was available in the Hanford Administrative Record to support this review, but the titles suggest much narrower scope and applicability.	Please correct this language and include a frank and factually accurate assessment of data gaps relevant to WAC 173-303-300, and 173-303-110 requirements: * When were dates of sample collection and analyses? * Were the waste samples and analyses in accordance with RPP-29002, and/or did some or all of these sample events predate that document? * Were the waste samples and analyses in accordance with the SST Component Closure DQO, and/or did some or all of these sample events predate that document? * Were the waste samples and analyses in accordance to SW-846, and/or did some or all of these sample events predate the compendium of methods required for waste analysis. * Were the waste samples and analyses in accordance with the quality assurance and quality control requirements of the Hanford Tri-Party Agreement and/or did some or all of these sample events predate that document. * Does Waste Stream Profile Sheet (RPP-29002) contain a signed LDR notification with the necessary certification statements required by	WAC 173-303-300 WAC 173-303-110 SW-846	4/24/26— WAC 173-303-300 requirements for on-site transfers from one storage unit (SST) to another storage unit (DST) are met for retrievals by following the cited Waste Analysis Plan document RPP-29002, which currently includes development of a waste stream profile sheet as part of the retrieval documentation process. WAC 173-303-300 requires an owner/operator to confirm knowledge about a dangerous waste before the transfer and allows for either process knowledge (e.g., Best Basis Inventory data) or sampling analysis data to confirm knowledge. Knowledge of the dangerous waste being received into DSTs is based on BBI. Thus, there are no data gaps associated with SST retrievals that need to be addressed through pre-retrieval sampling and analysis. This text in the TWRWP has been used for the previous 200 East Area SST retrievals and there is no need to make changes to the text for the A-103 TWRWP. Moreover, use of BBI to establish knowledge of the dangerous waste has been long-standing practice for SST retrievals, as previously memorialized and agreed to by Ecology, e.g., per Correspondence No. 0401281, DOE-ORP: 04-TPD-083 ("Agreement on Content of Tank Waste Retrieval Work Plans," dated August 20, 2004).	6/11/2026: The statement that H2C and DOE are 'Meeting the informational requirements for waste transfers meets the requirements of Washington Administrative Code (WAC) 173-303-300, "General Waste Analysis."' may be factually inaccurate and information supporting that statement is required. As a final facility operating to interim status standards DOE has been given many protections from the full final status facility requirements, but protection from WAC 173-303-300 is not one of them. This requirement applies for all owner/operators "before they store" waste, not just when they transfer it. Although you are correct that under 173-303-380 this requirement does come into play during other management activities, the absence of adequate waste characterization is probably a greater concern on its own than the inability to accurately record transfers. The cited 04-TPD-083 which describes expectations now codified in Appendix I is a useful historical	OPEN	JHD

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			173-303-140(2)(a) and 40 CFR 268.7 and if not does such a document exist. If so, who is the signatory. *If sample data meeting the analytical or equivalent knowledge requirements of WAC 173-303-300 and 173-303-110 have been collected in accordance with the above documents, please provide the data.			reference, and it is worth noting the requirements of that agreement are the same as what's being asked for here. The permittees are expected in the TWRP to plan for pre and/or post sampling based on the level of uncertainty and the tank waste characterization data for this tank is empirically sparse and antiquated. Beyond the bounded uncertainty permittees should be self-reporting, there is growing concern in Ecology about unretrieved soluble constituents. There have been multiple retrievals since 2004 and the concern is growing that untreated solids remaining on tank walls and ceiling, cannot be ignored. A residual inventory with a significant proportion of solids untreated by spraying in washing, but characterized solely by sampling of solids that have been rinsed of all soluble constituents is not going to be representative and will be inadequate for closer or post-closure. Now H2C is asserting that BBI is equivalent to knowledge, but BBI is not one of the knowledge sources challenged in this comment waste profile and another facilities WAP are. Ecology has access to TWINS data, if it were provided publicly without supporting analysis and bounded uncertainty calculations using BBI, pre and post sampling would likely still be required. Insisting BBI		

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						represents knowledge equivalent to the analytical requirements of SW-846, when the analytical data is not equivalent to the analytical requirements of SW-846 offers an opportunity to quantify uncertainty and improve data quality. DOE and H2C must correct the statement about meeting WAC 173-303-300 requirements in the TWRP and either provide all information requested in this RCR or complete the TWRP by preparing plans for pre and/or post retrieval sampling and analysis activities required to reduce uncertainties associated with waste transfer and storage, waste treatment, or closure.		
11.	Page 3-5 4th Paragraph 2nd Sentence	Last word is “suicers”, should that be “sluicers”?	Possibly modification of spelling	Clarification of spelling	Will correct, thank you.	12/1/2025: Accept	Close	LJ
12.	Page 3-6 2nd Paragraph 1st Sentence	Sentence uses the word “liquor stream”, is that correct or is it supposed to be “liquid stream”?	Possibly modification of spelling	Clarification of spelling	See response to comment 1 above.	12/1/2025: Accept	Close	LJ
13.	Page 3-6 3rd Paragraph 3rd Sentence	“the water used will not be saturated”, what would the water be saturated with?	See comment	Addition of detail	There is no expectation that raw water will be saturated with dissolved salts. This statement is used to strengthen the justification to sluice with water rather than supernate showing the benefit of sluicing with water, with little dissolved salt. Sluicing with water has a big impact on DST space compared to sluicing with supernate but it has the benefit of dissolving waste during the sluicing action.	12/1/2025: Accept pending response added to document 2/11/2026: Accept	Close	LJ

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14.	Page 3-6 3rd Paragraph Last Sentence	"the time needed to soften the waste is unknown", can you put in a estimate using examples from previous retrievals where this was necessary?	Though a timeframe for how long it would take to soften the waste is unknown, it may be helpful to input a rough estimate based on previous retrievals to provide a window of minimum and maximum times.	Exact time is unknown, but an estimate based off of past retrievals of time needed to soften would be helpful here.	Any estimate would be of little value. Retrieval experience has shown that each waste is unique. For retrieval planning purposes salt dissolution in AX-101 was compared to S-112. The retrieval equipment used in each tank was different and the estimated salt composition was different. AX-101 salts were more complex and expected to be more difficult to dissolve but proved to retrieve more efficiently (about 1 gallon of water per gallon of salt while S-112 was 3 gallons of water per gallon of salt). AX101 and S-112 were the most comparable retrieval but were vastly different.	12/1/2025: Accept	Close	LJ
15.	Page 3-6 4th Paragraph 2nd Sentence	What is "raw" water?	See comment	Clarification on what "raw" water is.	Raw water is water from the Columbia River that is not treated to make it potable. A definition will be added to the terms section.	12/1/2025: Accept pending redline 2/11/2026: Accept	Close	LJ
16.	Page 3-6 4th Paragraph 4th Sentence	Why is it helpful to use supernate when data shows salt dissolution has slowed when using water for sluicing? Can the document clarify what "supernate" is, preferably near the beginning, and how it is helpful in the retrieval process?	Clarification on the definition of supernate and it's use in retrievals.	Though the definition of supernate may already be set in a previous document, it is not a commonly used term so those new to retrievals may be unfamiliar with it and it would be helpful for it to at least be briefly defined in TWRWPs.	See response to comment 5 above for the benefit of supernate. Supernate is the liquid portion of waste from the DST. A definition will be added to the terms section.	12/1/2025: Accept pending redline 2/11/2026: Accept; also note that the comment referenced in Permittee Response is now 6.	Close	LJ
17.	Page 3-6 5th Paragraph Last Sentence	There is mention of "approved monitoring plans", is that an internal process that is approved internally by DOE? Or has Ecology seen these monitoring plans?	See comment	Clarification on documents referenced in TWRWP	Approved monitoring plans refers to the industrial hygiene monitoring plans further described in section 3.10 that are internally approved. As the industrial hygiene monitoring program has become more robust fewer details have been included in the TWRWP.	12/1/2025: Accept	Close	LJ

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18.	Page 3-6 Section 3.1.2 Last Paragraph	Text reads “The project will determine when a tank retrieval is complete when the recovery rate of that retrieval technology for that tank is, or has become, limited to such an extent that it extends the retrieval duration to the point at which continued operation of the retrieval technology is not practicable, with the consideration of practicability to include matters such as risk reduction, facilitating tank closures, cost, the potential for exacerbating leaks, worker safety and the overall impact on the tank waste retrieval and treatment mission.” There is no clear definition of what or who “The project” is regarding decision for technology completion or waste removal completion and the text does no provide any definitive terms to assess waste retrieval completion.	Provide clarification of “The Project” as it relates to who is making the determination for completion of any removal technology or making determinations of completion of either technology for waste removal.	Clarification of decision making process.	Agreed there is no clear definition of project, it was removed from the text. Recently Ecology was encouraged to visit the control trailer to see the retrieval/technology completion of A-101. Ecology will be encouraged to visit the control trailer to see the retrieval completion of A-103. Stakeholder involvement is very beneficial for this step in retrieval and for following the TPA process. as it is not a clearcut decision. If project or team or stakeholder was more rigidly defined retrieval operations may be slowed since there are times when all concerned do not or cannot witness the last steps of a technology deployment or the end of retrieval. Additional clarification is not as important as additional witnessing and involvement.	12/1/2025: Suggest deleting the word “project” and replace with “With collaboration between USDOE and the prime contractor, and concurrence from Ecology, it will be determined... " 2/11/2026: Accept	Close	CDG
19.	Page 3-7 Section 3.1.2 1st Paragraph	Text reads “There is no limit of technology definition for an ERSS waste retrieval process. A limit of technology definition will not be developed until sufficient ERSS retrieval operations have been performed to enable development of a justifiable definition.” Since there are no definitions or objective matrix for identifying a technology or when a technology is completed what is the process for determining the “justifiable definition” and who makes this judgement?	Provide clarification for the process for determining the “justifiable definition” and who makes this judgement.	Clarification of decision making process.	See response to comment 18. A framework for objective limit of technology determination was established for modified sluicing of sludge in tanks with sloped bottom. Essentially, when there is little retrieval progress for three consecutive shifts the technology is considered to be at the limit. Retrieval systems retrieve at different rates so the numeric definition is not universally applicable. In recognition of this fact, biweekly status meetings were established (see page 3-7) to keep Ecology informed of the progress or lack of progress of retrieval allowing Ecology time to plan for site visits to verify retrieval conditions.	12/1/2025: Should be clarified that judgement is in collaboration between USDOE and the prime contractor, and concurrence from Ecology, a limit of technology will be agreed to 2/11/2026: Accept	Close	CDG

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20.	Page 3-8 Section 3.3 1st Paragraph 1st Sentence	"The residual waste volume will be determined using the methodology defined in RPP-33403 and RPP-PLAN-23827." The latest revisions of these documents are still in comment disposition.	Resolution of comment dispositions for documents referenced in the TWRWPS.	Ecology would like to resolve open comments for these documents soon as they are actively referenced in TWRWPS.	The U.S. Department of Energy, Hanford Field Office (HFO) acknowledges the comments received from Ecology pertaining to RPP-23403 and RPP-PLAN-23827. Those comments pertain to secondary documents under the "Hanford Federal Facility Agreement and Consent Order" (HFFACO), 89-19, Rev. 9, Action Plan. The retrieval data report (RDR), sampling and analysis plan, and data quality objectives are issued for informational purposes and do not reflect decisions. Sections 9.2.1 and 9.2.3 of the TPA Action Plan do not require dispositions to Ecology comments that Ecology determines to be inadequately resolved.	12/1/2025: DOE has already responded to Ecology comments for those documents and are close to closing them out. While unrelated to the approval of this document, Ecology would like to finish the comment resolution process that has already been underway for these documents.	Close	LJ
21.	Page 3-10 Section 3.3 1st sentence	Text reads "Waste retrieval technologies currently available for deployment in tank A-103 are (1) sluicing with water or (2) modified sluicing with supernate." It is unclear if this sentence considers sluicing with water or sluicing with supernate one technology or two technologies and appears inconsistent with descriptions described previously.	Clarify when and how each different technology method will be used and how it will be determined that one or the other technology is completed.	Clarification of technologies.	As noted in section 3.0, A-103 retrieval is subject to the HFFACO not the Consent Decree. Under the HFFACO the number of technologies defined is less important because there is no requirement to count the number of technologies deployed. Section 3.0 also defines that the first technology is sluicing with water and supernate. Section 3.3 is justifying the technology selection not defining it.	12/1/2025: Pending discussion 2/11/2026: Accept; tied to RCR response to 19	Close	CDG/LJ
22.	Page 3-10 4th and 5th Paragraphs	Text reads "The second and third technology alternatives, if necessary, are high pressure water and chemical dissolution. High pressure water can be deployed with an ERSS or an in-tank vehicle; an in-tank vehicle is not desirable due to some obstructions in the tank, and vehicle systems have been less reliable than ERSS." It is unclear when one technology is applied or completed and if high pressure water and high pressure water with chemicals is one or two different	Clarify when and how each different technology method will be used and how it will be determined that one or the other technology is completed.	Clarification of technologies.	See response to comment 6 and 21.	12/1/2025: Pending discussion 2/11/2026: Accept; tied to RCR response to 19. Also note that the comment referenced in Permittee Response is now 6 and 21.	Close	CDG

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		technologies. Descriptions of these applications is inconsistent with descriptions of technologies described previously.						
23.	Page 4-1 Section 4.1.1 Page 4-2 Figure 4-1	Text reads “Seven drywells that are in the vicinity of tank A-103 will be used for leak detection monitoring. The monitoring drywells are between approximately 5 and 14 ft. from the edge of the tank footer (Figure 4.1). The eight drywells are 10-03-01, 10-03-02, 10-03-04, 10-03-05, 10-03-07, 10-02-03, 10-03-10, and 10-03-11. Except for drywells 10-03-11, the drywells are approximately 125-ft. deep or deeper. Drywells 10-03-11 is about 85-ft. deep (GJ-HAN-106).” Figure 4-1 depicts eight drywells.	Clarify if there are seven or eight dry wells to be monitored for retrieval. Clarify if drywell monitoring/logging results will be provided to ecology for review/examination.	Clarification for monitoring.	Will change seven to eight.	12/1/2025: Accept - JR	Close	CDG / JR
24.	Figure 4-2 and Section 4.2.1.3 and Section 4.3	The flow chart in Figure 4-2 labels attainment of pre-retrieval ER baseline data as part of the leak detection methodology. In Section 4.2.1.3, it is stated that ER will be performed during retrieval, but there is no mention of when pre-retrieval baseline data/survey will be collected. Section 4.3 also mentions pre-retrieval ER baseline will be performed, but with no timeline.	Clarify when pre-retrieval baseline ER survey will be performed.	Add detail.	Section 4.3 states that a pre-retrieval baseline is performed. Additionally TFC-OPS-OPER-C-48 requires that the operation manager “Ensure there is a minimum fourteen-day baseline HRR data accumulation period prior to initial start of waste retrieval.” The schedule varies based on construction activities and other operational conditions such as power outages and cathodic protection system testing.	12/1/2025: Accept.	Close	JR
25.	Page 4-3 Section 4.2.1 2nd Paragraph	Text reads “Established drywell logging methods will be used to survey the drywells surrounding tank A-103 prior to the start of retrieval and will be used as a backup means of leak detection if the ER system becomes not operable. The use of drywell logging as a backup is specified in 4.2.1.1.”	Revise text in 2nd Paragraph to agree with Section 4.2.1.1 3rd bullet item stating “Gamma scans will be obtained for each listed drywell following completion of active retrieval operations in the tank.”	Clarification for monitoring.	Section 4.2.1 includes the statement “Figure 4-2 is a logic chart showing what leak detection method(s) are used and when. Details of the methods shown in Figure 4-2 are provided in 4.2.1.1 through 4.2.1.3.” Figure 4-2 shows the frequency and why drywell logging is performed. Section 4.2.1.1 provides additional detail about	12/1/2025: Accept	Close	CDG

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		Section 4.2.1.1 3rd bullet item states "Gamma scans will be obtained for each listed drywell following completion of active retrieval operations in the tank."			logging (pre-and post logging, depth interval, tools, etc.). There does not appear to be a conflict that needs clarification.			
26.	Page 4-3 Section 4.2.1 7th Paragraph	"any resulting changes to LDM activities described in this TWRWP will be approved by Ecology within 24 hours through the Change Notice Form." This statement feels like it carries a lot of authority behind it. Is DOE authorized to force Ecology to approve something?	Change wording or call out a WAC code that requires Ecology to do this.		As noted in section 4.6.2.2 changes to DST LDM requires notification within 24 hours according to the SY settlement agreement. Changes to the DST LDM could make the systems different than what is approved and described in the TWRWP resulting in a stop to retrieval activities. This requirement in the TWRWP was included to ensure continuity of retrieval operations.	12/1/2025: Clarify why Ecology needs to "approve" within 24 hours or what regulations require it. How does an agreement for a DST work with a SST document? 2/11/2026: Accept	Close	LJ
27.	Page 4-4 Figure 4-2	When the ER system is operable and retrievals are on-going, if the ER system is monitoring continuously, can that be added to the figure?	Note in the figure if the ER system is operating continuously.	Operational timeframe of ER system is missing from figure.	Continuous would be inaccurate. The scan frequency is approximately every 15 minutes for each well. The system is turned off for lightning protection, drywell logging, and during some construction activities.	12/1/2025: Accept pending clarification added to figure 2/11/2026: Accept	Close	LJ
28.	Page 4-5 5th Paragraph	Text reads "Pre-retrieval gamma scans will preferably be obtained within a year of retrieval start but may be within two years—with approval from Ecology." It is understood that retrieval is scheduled within the coming year to two years the timing for scheduling the gamma scans seems inconsistent and should be performed sooner than stated.	Adjust timeline for gamma scans per known schedule for retrieval of waste.	Clarification for monitoring.	Please clarify this comment. Typically the goal is to perform gamma logs as a baseline close to the start of retrieval so that any noted changes to the profile could be better attributed to the retrieval activity. If interpreted correctly this comment seems to imply that logs should be performed longer than two years from retrieval which would be counter to past Ecology requests.	12/1/2025: Accept	Close	CDG
29.	Page 4-7 Section 4.2.1.2 Dry Tank	It is unclear when or how the "Dry Tank" status will exist for A-103.	Clarify how and if "Dry Tank" monitoring will exist at A-103.	Clarification for monitoring.	It almost all circumstance it is safer for workers when tanks are exhausted, so when there is a high level of work in a tank farm and exhausters are available they are operated if possible. Exhausting tanks evaporates liquid drying them out. Tank A-103 will be exhausted for some time after retrieval operations are complete to support post retrieval activities	12/1/2025: Accept	Close	CDG

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					such as sampling, volume measurement, and possibly equipment removal.			
30.	Page 4-8 Section 4.2.1.3 2nd Paragraph Last Sentence	"Changes in soil moisture due to precipitation need to be taken into consideration during monitoring to reduce the potential for making an incorrect leak determination." It should be noted that there is an infiltration/percolation rate for surface water to enter into the backfill soils and underlying sediments and there is not a direct 1:1 correlation with a precipitation event and soil moisture increase.	Possible delayed evidence of increased soil moisture due to rate of infiltration/percolation following a precipitation event should be added.	Composition of backfill soils and underlying sediment may impact the infiltration/percolation rate at which moisture will permeate through the ground following a precipitation event and need to be considered.	Please clarify this comment. Routine monitoring with electrical resistivity includes tracking precipitation and evaluating whether or not precipitation caused an anomalous event. If an anomalous even cannot be attributed to precipitation and investigative activities have commenced, possible groundwater monitoring changes will be considered.	12/1/2025: Clarification: when reading the results of routine monitoring following a rain event, an anomalous event may follow later than the precipitation event. Ecology is asking if DOE understands this delay when performing monitoring. An addition to the text stating this if it is understood would be helpful. If the comment is still unclear, Ecology can clarify further.	Close	LJ
31.	Page 4-9 Section 4.2.1.3	Given the limitation to ER-LDM noted in section 4.2.1.3 (a primarily two-dimensional measurement without discrete depth detection), is the use of both ER and vertical drywell monitoring been considered in the retrieval planning?	Clarification.		For retrieval operations, electrical resistivity is used to determine whether or not retrieval activities have caused a leak from the tank being retrieved. If there is anomalous data that cannot be explained investigations that are outside the scope of this work plan are started. The investigation may use drywell data to determine the source of the anomalous data.	12/1/2025: Accept.	Close	JR
32.	Page 4-10 Section 4.3 2nd Sentence	Text reads "A pre-retrieval ER baseline is performed since ER leak detection is based upon observation of resistivity change from an established baseline.' Why is there not a post-retrieval ER survey?	Include a post-retrieval ER survey just as you are proposing post-retrieval drywell gamma logging.	Clarification for monitoring.	Please clarify this comment. The pre-retrieval electrical resistivity baseline primarily establishes the range of response variation for the soil, infrastructure, and electrical environment around the tank. Based on this range, "alarm" points are calculated to alert operators to anomalous data. Since the data that is collected every 15 minutes is the same throughout active retrieval a post active retrieval baseline would be no different than pre-retrieval	12/1/2025: Accept	Close	CDG
33.	Page 4-17 Section 4.6.1.2 Paragraph 8	Plan states: Inform Ecology within 72 hours that the evaluation process in TFC-ENG-CHEMP-57 was initiated and that	I understand that the 24 hour leak detection interim status operating requirement may not practicable and		4/24/26—An internal environmental notification procedure has the 72 hour window for providing a written response. A	5/27/2026: Accept	Close	JHD

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		liquid additions to the tank have been suspended to validate if a leak has occurred.	that the evaluation may even take more than 72 hours, but why is the notification delayed 72 hours?		written notification is drafted, reviewed by involved tank contractor organizations and HFO and then finalized before being sent to Ecology. The 72 hours provides the time necessary to follow this process.			
34.	Page 4-18 Section 4.6.2.1 1st Paragraph 2nd Sentence	"Since any DST leak would be into the annulus surrounding the primary containment tank, there is no release to the environment to mitigate, but timely response to a leak should minimize the volume of waste that enters the tank annulus." It is an assumption that a DST leak would only be in the annulus and not to the environment. Though chances are low, they are not 0%.	Stating there is "no release to the environment to mitigate" is an assumption. Text should be revised to state that the chances are low and that if that were to happen there are mitigation responses if that were to happen.	Stating there is "no release to the environment" is a big assumption considering there have been leaking DSTs in the past. And even if there weren't, mitigation efforts should still be in place just in case.	Will add ….assumed to be no release to the enviornment….	12/1/2025: Accepted based on redline 2/11/2026: Accept	Close	LJ
35.	Page 4-1 (page 63)	The page number is 4-1	The page numbering needs to change for Section 5	Editorial	Thanks, the word file seems to have the correct numbering. Will check our document conversion program.	12/1/2025: Accept	Close	AJG
36.	Page 7-2 Section 7.1 Groundwater Pathway Impacts, Retrieval Leak Inventories	Text cites "RPP-RPT-64273, 2023, Tanks 241-A-103 and 241-A-106 Groundwater Risk Constituent Concentration Estimate, Rev. 0, Washington River Protection Solutions, LLC, Richland, Washington." (cited 7 times in the A-103 TWRWP)	RPP-RPT-64273, 2023, Tanks 241-A-103 and 241-A-106 Groundwater Risk Constituent Concentration Estimate, Rev. 0, Washington River Protection Solutions, LLC, Richland, Washington. Is not the Hanford Administrative Record.	Per HAFFCO, place document in the AR. ECY needs document to fully evaluate and review RPP-PLAN-65683 A-103 TWRWP.	Document will be placed in the AR.	12/1/2025: Searched AR on 11/10/2025. RPP-RPT-64273 was not in the Hanford AR. 2-10-2026: Searched the Hanford AR using "RPP-RPT-64273 and there were 5 results. Accession AR-39260, placed on the AR website on 2-4-2026, contained RPP-RPT-64273 2023, Tanks 241-A-103 and 241-A-106 Groundwater Risk Constituent Concentration Estimate, Rev. 0.	Close	GWP

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37.	Page 7-3 (69/134) Section 7.1.1 Retrieval Leak Evaluation Methodology Page 7-6 (72/134) Table 7-1 Columns 5 and 6 Page 7-15 (81/134) Section 7.1.1.4 Exposure Scenarios Page 7-17 (83/134) Table 7-4 Column 3	55 instances of "tap water" in A-103 TWRWP. The EPA Tap Water scenario is not one of the state's scenarios for drinking water under WAC 173-303, which references WAC 173-340. WA ECY uses scenarios defined in WAC 173-340-720 Groundwater cleanup standards when dealing with non-radiological RCRA/dangerous waste units including the tank farms. The EPA tap water scenario can be an additional line of evidence and may be helpful but is secondary to the scenarios associated with WA State regulations. The Hanford Site-Wide Permit Rev.9 (WA7890008967) SST permit will not refer to the EPA Tap Water scenario, rather, we will be adhering to the requirements in WAC 173-340-720.	Replace "Use EPA's Tap Water exposure scenario to calculate radiological and non-radiological human health impacts." With "Use EPA's Tap Water exposure scenario to calculate radiological human health impacts. Use WAC 173-340-720, Groundwater cleanup standards to calculate non-radiological human health impacts."		The phrase "Use EPA's Tap Water exposure scenario to calculate radiological and non-radiological human health impacts" cannot be changed as requested because the tap water exposure scenario was used to calculate the ELCR and Hazard Quotient results in the document. An additional bullet needs to be added to section 7.1.1 that states "compare peak modeled groundwater concentrations for each radionuclide with the CLARC Method B (cancer) and CLARC Method B (non-cancer) drinking water standards." The Principles and Parameters document states that both EPA tap water scenario and MTCA B will be used to evaluate protection of groundwater. To comply with that document we will retain both methods in this TWRWP. Since the CLARC Method B noncancer drinking water standard is calculated with Eq. 720-1, and the CLARC Method B cancer drinking water standard is calculated with Eq. 720-2, then comparing the peak modeled groundwater concentration to those limits complies with the guidance in WAC 173-340-720. 4/24/2026: Changed bullet #2 on page 7-3 to remove radiological/non-radiological identification, deferring simply to simulated/modeled groundwater concentrations for indicator contaminants. A consistent change has been made throughout the text as well." " Table 7-1 has been updated to include ELCR and HQ values for the indicator	12/1/2025: Would need to see redline to verify/validate Permittee Response 2-10-2026: Ecology stands behind the statements made regarding the EPA Tap Water Scenario in column 3, Comment or Question. Permittee Response Paragraph 1: Referring to Sec. 7.1.1 Retrieval Leak Evaluation Methodology. Ecology does not agree with the Permittee response, Paragraph 1: "because the tap water exposure was used…" Permittee should be calculating non-radiological human health impacts attributable to groundwater (separately from calculations for radiological human health impacts) using regulatory requirements in WAC 173-303 and its references to WAC 173-340-720 Groundwater Cleanup Standards and WAC 173-340-708 and its directions for evaluation/ assessment of Human Health Risk. Permittee Response Paragraph 2, Referring to Sec. 7.1.1 Retrieval Leak Evaluation Methodology and bulleted points: Ecology does not agree with the added Bullet 2 to the redline, "compare peak modeled groundwater concentrations for each radionuclide with the CLARC	Open	GWP

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					contaminants calculated using MTCA Method B equations and parameters. The values computed using the EPA Tap Water Scenario are retained. We will take the suggestion to separate rads and non-rads into their own table for future documents. In 2019 and 2020, the Tri-Parties developed DOE RL 2019 46, "Central Plateau Inner Area Cleanup Principles and Parameters" ("Principles and Parameters") to establish a standardized set of cleanup principles for the Inner Area of the Central Plateau that could be incorporated into work plans for Operating Units and SST WMAs. The objectives of Principles and Parameters are to (1) provide a consistent approach for assessment of risks to human health and the environment and evaluation of remedial alternatives within the Inner Area; and (2) identify and implement regulatory strategies that would optimize resources, streamline documentation requirements, and promote consistency in decisions. The outcome of the initiative was the establishment of an overarching and consistent set of cleanup principles agreed to by the Tri-Parties as being the foundation for evaluating waste sites and making cleanup decisions for each of the SST WMAs. Accordingly, the Principles and Parameters were adopted and institutionalized in the TPA Action Plan, Appendix F, Supporting Technical Plans and Procedures. The substantive components of Principles and Parameters relate to land use, baseline risk assessment, applicable cleanup levels, and points of compliance. The Tri-Parties also agreed that DOE-RL-2019-46 will be	Method B (cancer) and CLARC Method B (non-cancer) drinking water standards". The WAC, including WAC 173-340 and associated CLARC Tables, do not reference radionuclides. Revise "radionuclide" to "non-radionuclide contaminant". Permittee Response Paragraph 3 and referring to Sec. 7.1.1.4 Exposure Scenarios: Ecology reminds Permittee that DOE/RL-2019-46 Principles and Parameters document is currently under Ecology legal review and that WA state's primary drinking water scenario is delineated under WAC 173-303, which references WAC 173-340. Permittee Response Paragraph 4 states "Since the CLARC Method B noncancer drinking water standard is calculated with Eq. 720-1, and the CLARC Method B cancer drinking water standard is calculated with Eq. 720-2, then comparing the peak modeled groundwater concentration to those limits complies with the guidance in WAC 173-340-720." Related redline Bullet 4 states "compare peak modeled groundwater concentrations for each **non-**radionuclide [revised per above] with the CLARC Method B (cancer and CLARC Method B (non-cancer) drinking water standards."		

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					included by reference or as an insert to RFI/CMS work plans for SST WMAs and, when added by reference, is fully enforceable as an essential part of the work plans for all Parties. The TWRWP includes a groundwater protection evaluation that is consistent with DOE RL 2019 46. For the protection of groundwater, DOE RL 2019 46 requires the use of Soil Screening Levels (SSLs) to identify COPCs and Preliminary Remediation Goals (PRGs) to establish groundwater cleanup levels. For SSLs, the applicable exposure model for non radiological chemicals is the EPA Tap Water Scenario. For PRGs, cleanup levels are based on the lower of State or Federal drinking water limits or MTCA Method B cleanup levels calculated using WAC 173 340 720 Equations 720 1 and 720 2. The TWRWP risk assessment does not calculate SSLs directly. Instead, it uses a site specific model incorporating the EPA Tap Water Scenario to evaluate groundwater protection. For non radiological, non carcinogenic chemicals, the SSL Hazard Index is compared to the permissible value of 1. For carcinogens, the SSL risk evaluation is compared to the allowable cumulative risk of 10^{-5} and individual risk of 10^{-6}. The TWRWP also does not compute PRGs directly. It compares peak simulated concentrations from the site specific model to PRG values already calculated and published in the State's CLARC tables (based on WAC 173 340 720 Equations 720 1 and 720 2). Equivalent comparisons are made for both non carcinogenic and carcinogenic chemicals.	For Sec. 7.1.1, Bullet 4: The statement "Use EPA's Tap Water exposure scenario to calculate radiological and non-radiological human health impacts." was not revised to specify the required non-radiological constituent calculations found in WAC 173-303 and its references to WAC 173-340-720 Groundwater Cleanup Standards and WAC 173-340-708 and its directions for evaluation and assessment of Human Health Risk. Permittee Response Paragraph 4 correction: "…complies with the guidance in WAC 173-340-720." is incorrect. WAC 173-340-720 is a required regulation, not guidance. Permittee Response Paragraph 4 correction: Comparing peak modeled groundwater concentrations of non-radiological constituents to the requirements in WAC 173-340-720 **<u>does not imply</u>** compliance with required regulations. The statement commits a *non sequitur* logical fallacy. Ecology suggests that Table 7-1 include columns for nonradionuclide contaminants or, alternatively, splitting out nonradionuclides into a second table apart from		

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					DOE presents both comparison methods to remain consistent with DOE RL 2019 46, without asserting that either approach is subordinate to the other. According to TPA Action Plan Appendix I Section 2.1.3, the purpose of the risk assessment in the TWRWP is "not make final retrieval or closure decisions" but to "aid operational decisions during retrieval activities". The results tables have been updated to include ELCR and HQ values derived using MTCA Method B. and the EPA Tap Water Scenario so that conclusions regarding operational decisions during retrieval activities can be made without excluding either method.	radionuclides. Using Feb. 5, 2026 CLARC MTCA Method A or B (Cancer) Groundwater Cleanup Levels (mg/L) values for nonradionuclides, Table column headers should include: • Non-radiological Excess Lifetime Cancer Risk under WAC 173-340-700 (5) Methods for setting cleanup levels (b) Method B: Universal method. • Non-carcinogenic Chemical Hazard Quotient under WAC 173-340-700 (5)(b) See also Ecology Response to comment #38, #42 and #43. 6-11-2026: ECY appreciates the DOE disposition on 4-24-2026. However, it did not address the comment as explained in our previous response.		
38.	Page 7-15 Section 7.1.1.4 Exposure Scenarios	The Principles and Parameters document (DOE/RL-2019-46) is used to reference exposure scenarios: "…groundwater protection will be evaluated using EPA's residential tap water scenario." The EPA Tap Water scenario is not one of the state's scenarios for drinking water under WAC 173-303, which references WAC 173-340. WA ECY uses scenarios defined in WAC 173-340-720 Groundwater cleanup standards when dealing with RCRA/dangerous waste units including the tank farms. The	Replace "EPA Tap Water Scenario (Residential)" With "Groundwater cleanup standards"		The Principles and Parameters document states that both EPA tap water scenario and MTCA B will be used to evaluate protection of groundwater. To comply with that document we will retain both methods in this TWRWP. Since the CLARC Method B noncancer drinking water standard is calculated with Eq. 720-1, and the CLARC Method B cancer drinking water standard is calculated with Eq. 720-2, then comparing the peak modeled groundwater concentration to those	12/1/2025: See ECY response to comment 34 (now 37). 2-10-2026: For paragraph 1 of the Permittee Response, Ecology reminds Permittee that DOE/RL-2019-46 Principles and Parameters document is currently under Ecology legal review and that WA state's primary drinking water scenario is delineated under WAC 173-303, which references WAC 173-340.	Open	GWP

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		EPA tap water scenario can be an additional line of evidence and may be helpful but is secondary to the scenarios associated with WA State regulations. The Hanford Site-Wide Permit Rev.9 (WA7890008967) SST permit will not refer to the EPA Tap Water scenario, rather, we will be adhering to the requirements in WAC 173-340-720.			limits complies with the guidance in WAC 173-340-720. 4/24/26: Changed section 7.1.1.4 to be consistent with what is suggested. According to TPA Action Plan Appendix I Section 2.1.3, the purpose of the risk assessment in the TWRWP is "not make final retrieval or closure decisions" but to "aid operational decisions during retrieval activities". The results tables have been updated to include ELCR and HQ values derived using MTCA Method B. and the EPA Tap Water Scenario so that conclusions regarding operational decisions during retrieval activities can be made without excluding either method.	Ecology requests changes to Permittee redline revisions to Section 7.1.1.4: Sentence 1, "…COC concentration…" should be revised to stipulate 'non-radiological COC concentrations'. Sentence 2, "These concentrations are used to demonstrate compliance with the Model Toxics Control Act…" needs revision to "These non-radiological COC concentrations may be used to inform assessments of modeled estimates of groundwater cleanup levels under the WAC 173-340-720." For paragraph 2 of the Permittee Response, a correction: "…complies with the guidance in WAC 173-340-720." needs revision. WAC 173-340-720 is a **required regulation**, not guidance. For paragraph 2 of the Permittee Response: As pointed out in comment #37, Comparing peak modeled groundwater concentrations of non-radiological constituents to the requirements in WAC 173-340-720 **does not imply** compliance with required regulations. The statement commits a *non sequitur* logical fallacy. Other parts of Sec. 7.1.1.4 need revision. Specifically, the third sentence beginning with "However, a subsequent agreement between…" omits an important regulatory		

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						concern: groundwater protection for non-radiological constituents will be evaluated with the state's scenarios for drinking water under WAC 173-303. The EPA Tap Water scenario is not one of the state's scenarios for drinking water under WAC 173-303, referencing WAC 173-340-720. ECY reiterates the statement put forth in column 3 of this comment and comment #37: The Hanford Site-Wide Permit Rev.9 (WA7890008967) SST permit will not refer to the EPA Tap Water scenario, rather, we will be adhering to the requirements in WAC 173-340-720. See Ecology Response to comment #37, #42 and #43. 6-11-2026: ECY appreciates the DOE disposition on 4-24-2026. However, it did not address the comment as explained in our previous response.		
39.	Page 7-9, Table 7-1, Footnotes f through j	Table 7-1 has footnotes f through j tacked onto its bottom (page 7-9) but none of these footnotes are found in the body of the table.	Missing footnotes from body of Table 7-1.	Correct Table for logical consistency and quality control / errors in standard table composition	Footnotes 'f' through 'j' are in the "Source Term" column. Footnote 'f' refers to "A-103 Retrieval Leak", footnote 'g' refers to "A Farm Retrieval Leaks", footnote 'h' refers to "AX Farm Retrieval Leaks", footnote 'i' refers to "WMA A-AX Residual Waste" and footnote 'j' refers to "Tank 241-A-103 Residual Waste".	12/1/2025: ECY review oversight. The superscripts are in Table 7-1.	Close	GWP

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40.	Page 7-14, 1st paragraph, 1st sentence	The text reads: "After simulating a historical 3,000-year period to initialize conditions in the vadose zone, simulations were carried out for the 10,000-years between the calendar years 1940 to 11940." How realistic are these numbers given the large extrapolations compared to the data provided at the time of the simulation?	Please explain.	Clarification.	Historical numbers and conditions used in simulations are informed from the history of the site and past site characterization activities. This information has been studied for decades and the most current information is considered the best estimate of the past conditions. The simulated infiltration for 3,000 years prior to the operations period is a means to establish the best estimate of moisture distribution in the subsurface prior to the ground disturbance from construction of the site. Projections beyond present day are based on mission planning and design bases, and to some extent negotiated values from agreements that are made. Consequently, parameter values applied to future conditions are assumptions that generally reflect the intended conditions or pessimistic representations of the intended conditions.	12/1/2025: Accept	Close	MCM
41.	Page 7-15, Section 7.1.1.4 Exposure Scenarios	Text states “RCRA Closure and post-closure requirements are described in WAC 173-303-610; closure requirements under this section are defined in WAC 173-303-610 (2) and 2(i).” Text states “These sections refer to WAC 173-340-700…”	TYPO: this should be "2(b)(i)" not "2(i)". Detail needed to clarify what “These sections…” refers to.	Incorrect statute citation. More details needed.	The typo will be corrected. “These sections…” refer to WAC 173-303-610(2)(b)(i), so the text will be changed to “This section…”	12/1/2025: Would need to see redline to verify/validate Permittee Response. 2/11/2026: Accept.	Close	GWP
42.	Page 7-15, Section 7.1.1.4 Exposure Scenarios	Text states “The inputs and assumptions used for the tap water scenario follows the procedural requirements described in WAC 173-340-708 thus meeting RCRA closure requirements and WAC 173-340.”	Add sufficient detail to convince ECY that the inputs and assumptions of the tap water scenario follow the procedural requirements described in WAC 173-340-708 (pages 114 to 124 of the WAC 173-340 pdf) How does RCRA closure requirements factor into this argument?		We propose that this text be deleted. The TWRWP evaluates human health risk using both by comparing peak modeled groundwater concentration to Method B (cancer and noncancer) drinking water limits and calculating risk and hazard quotients using the EPA tap water scenario, in keeping with the guidance in the principles and parameters document. 4/24/2026: Deleted text identified in the	12/1/2025: Would need to see redline to verify/validate Permittee Response. 2/11/2026: Permittee did not delete/revise the redline text Ecology called out initially in the Comment or Question column, e.g., “The inputs and assumptions used for the tap water scenario follows the procedural	Open	GWP

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			Why does the sentence end with "WAC 173-340"?		comment. According to TPA Action Plan Appendix I Section 2.1.3, the purpose of the risk assessment in the TWRWP is "not make final retrieval or closure decisions" but to "aid operational decisions during retrieval activities". The results tables have been updated to include ELCR and HQ values derived using MTCA Method B. and the EPA Tap Water Scenario so that conclusions regarding operational decisions during retrieval activities can be made without excluding either method.	requirements described in WAC 173-340-708 thus meeting RCRA closure requirements and WAC 173-340." Permittee needs to add sufficient details and/or explanations to support their statement that "The inputs and assumptions used for the tap water scenario follows the procedural requirements described in WAC 173-340-708 thus meeting RCRA closure requirements and WAC 173-340." What procedural requirements in WAC 173-340-708 Human health risk assessment procedures are being referenced? Permittee did not answer the other two questions in the Modification Need column: How does RCRA closure requirements factor into this argument? Why does the sentence end with "WAC 173-340"? Ecology reminds Permittee that The EPA Tap Water scenario is not one of the state's scenarios for drinking water under WAC 173-303, which references WAC 173-340. WA ECY uses scenarios defined in WAC 173-340-720 Groundwater cleanup standards when dealing with RCRA/dangerous waste units including the tank farms. The EPA tap water scenario can be an additional line of evidence and may be helpful but is secondary to the scenarios associated with WA State		

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						regulations. The Hanford Site-Wide Permit Rev.9 (WA7890008967) SST permit will not refer to the EPA Tap Water scenario, rather, we will be adhering to requirements in WAC 173-340-720. 6-11-2026: ECY appreciates the DOE disposition on 4-24-2026. However, it did not address the comment as explained in our previous response.		
43.	Page 7-15, Section 7.1.1.4 Exposure Scenarios	Text states "Consequently, current PA and groundwater Impacts Analysis efforts and other risk assessments being conducted on the Central Plateau rely on EPA's tap water scenario, to evaluate cancer risk and non-cancer hazards from exposure to groundwater, no longer evaluate an industrial scenario that uses groundwater."	This sentence is structurally/grammatically incorrect. Revise. The sentences preceding this sentence were questioned in the comment above: "the EPA Tap Water scenario is not one of the state's scenarios for drinking water under WAC 173-303 Groundwater cleanup standards, which references the Model Toxic Control Act (MTCA) WAC 173-340. ECY uses scenarios defined in WAC 173-340-720 Groundwater cleanup standards when we are dealing with RCRA/dangerous waste units including the tank farms."		We propose the changes to the text (new additions are underlined, new deletions are in strikeout): "Consequently, current PA and groundwater Impacts Analysis efforts and other risk assessments being conducted on the Central Plateau rely on both MTCA potable groundwater cleanup levels defined in WAC 173-340-720, "Groundwater Cleanup Standards" and EPA's tap water scenario, to evaluate cancer risk and non-cancer hazards from exposure to groundwater no longer evaluate an industrial scenario that uses groundwater. The scoping process as documented in these data packages also indicated that simulated groundwater concentrations would also be compared to 2007" MTCA potable groundwater cleanup levels defined in WAC 173-340-720, "Groundwater Cleanup Standards," to meet RCRA requirements. 4/24/26: The statement "…current PA and groundwater Impacts Analysis efforts and other risk assessments being conducted on the Central Plateau rely on both MTCA potable groundwater cleanup levels defined	12/1/2025: ECY prefers language elevating MTCA / WAC above EPA tap water scenario. That is, document agrees that MTCA/WAC is the guiding regulation, and the EPA Tap Water Scenario is secondary and may be useful. Would need to see redline to verify/validate Permittee Response. 2/11/2026: ECY acknowledges the revisions to the redline in the sentence starting with "Consequently, current PA and groundwater Impacts Analysis efforts and other risk assessments being conducted…". ECY rejects the assertion that current PA and groundwater Impacts Analysis efforts and other risk assessments "…rely on both…"	Open	GWP (ECY)

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					in WAC 173-340-720, "Groundwater Cleanup Standards" and EPA's tap water scenario, to evaluate cancer risk and non-cancer hazards from exposure to groundwater" is a statement of fact. The aforementioned documents use both stated methods to develop analyses and conclusions. According to TPA Action Plan Appendix I Section 2.1.3, the purpose of the risk assessment in the TWRWP is "not make final retrieval or closure decisions" but to "aid operational decisions during retrieval activities". The results tables have been updated to include ELCR and HQ values derived using MTCA Method B. and the EPA Tap Water Scenario so that conclusions regarding operational decisions during retrieval activities can be made without excluding either method.	WAC 173-340-720 Groundwater Cleanup Standards and EPA's tap water scenario. Ecology reiterates its statement that the state's scenarios for drinking water exist under WAC 173-303 Groundwater cleanup standards and its references the Model Toxic Control Act (MTCA) WAC 173-340. Specifically, the Ecology relies on scenarios defined in WAC 173-340-720 Groundwater cleanup standards when dealing with RCRA/dangerous waste units including the tank farms. The EPA tap water scenario can be an additional line of evidence and may be helpful, but is secondary to the scenarios associated with WA State regulations. 6-11-2026: ECY appreciates the DOE disposition on 4-24-2026. However, it did not address the comment as explained in our previous response.		
44.	Page 7-15, Section 7.1.1.4 Exposure Scenarios	Text states that "The scoping process as documented in these data packages also indicated that simulated groundwater concentrations would also be compared to 2007 MTCA potable groundwater cleanup levels defined in WAC 173-340-720, "Groundwater Cleanup Standards," to meet RCRA requirements."	What data packages are being referred to? Why are you citing 2007 MTCA potable groundwater cleanup levels?		Please see the response to comment #43. We propose that this text be deleted.	12/1/2025: Would need to see redline to verify/validate Permittee Response. 2/11/2026: Accept. Also note that the comment referenced in Permittee Response is now 43.	Close	GWP

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45.	Page 7-17 (83/134)	Text states "Groundwater contaminant concentrations and related cancer risks and health hazards from tank A-103 residual wastes were exported from the system models used for RPP-ENV-62206 and RPP-ENV-61497." Give more details here. What does "exported" exactly mean here? Were general groundwater contaminant concentrations and related cancer risks and health hazards calculated using data unique to tank A-103?	Add details so reader can follow the data and methods/calculations/data input into what model / model outputs and why they are unique to tank A-103.		"Export" means to move data from one software to another. In this case, the data are the groundwater concentration results from the system models used for RPP-ENV-62206 and RPP-ENV-61497. These data were exported from GoldSim to Excel, where they could be multiplied by the appropriate unit human health effect factors to obtain hazard quotient and cancer risk values for each analyte. All calculations in this analysis were performed using inventory and volume data unique to Tank A-103. The groundwater concentration values that were exported from the RPP-ENV-62206 and RPP-ENV-61497 system models resulted from simulations that used waste volumes and inventories specific to tank A-103 as described in those documents.	12/1/2025: Accept.	Close	GWP
46.	Page 7-17 Table 7-4 footnote a and b	Footnotes state that calculations were made from "RPP-ENV-58813, Appendix H"	The latest revision of RPP-ENV-58813 is Rev. 2 and it has no Appendix H. If you are referring to Rev. 1, state that specifically. Then state for each instance if RPP-ENV-58813 whether Rev. 1 or Rev. 2 is being referred to. If Rev. 1 is equivalent to Rev. 2 in terms of assumptions and equations to calculate cancer and noncancer risks for EPA tap water, state that in the text for clarification.		All references to section H.3.1 of RPP-ENV-58813, Rev. 1 will be changed to Section 5.3.1 of RPP-ENV-58813, rev. 2.	12/1/2025: Would need to see redline to verify/validate Permittee Response. 2/11/2026: ECY acknowledges the redline revisions to Section 7.1.1.	Close	GWP
47.	Page 7-18 Section 7.1.2 Last Paragraph 2nd Sentence	"the long transport time is influenced by the layer of fine sediments noted in section 7.1.3.3." Mention of fine sediments is made a few times in the document, stating that a layer of fine sediments occurs only below the AX tanks in the model just above the water table.	Clarification on lateral continuity of fine sediments under AX.	If there is a possibility the fine sediment layer is not entirely laterally continuous, there is a chance of a pathway leading into the water table, and that should be considered in the model, even if unlikely.	The WMA A-AX Geologic Framework Models are based on the lithostratigraphic information and geophysical data from selected interpreted boreholes and wells and use this information and data to identify and spatially interpolate distribution and thicknesses of the geologic units in a manner consistent with the Hanford Site stratigraphic nomenclature. The geologic framework model for Hanford	12/1/2025: Is Rev 4 the latest version of ECF-Hanford-13-0029? There seems to be a Rev 5 available in the AR that states additional boreholes were added and some were revised. Has that been taken into consideration?	Close	LJ

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		Is it assumed this layer of fine sediments is laterally continuous beneath all of AX? would it make a difference in the model to assume that there may be discontinuity of this layer, therefore resulting in a possible pathway to the water table? Has it been considered that the contaminates could flow laterally along this fine layer and find another pathway outside of this layer?			South is developed in ECF-HANFORD-13-0029, Rev. 4, "Development of the Hanford South GeologicFramework Model, Hanford Site, Washington Fiscal Year 2016 Update."(https://pdw.hanford.gov/document/0072357H) with limited modifications discussed in RPP-RPT-60171, "Model Package Report: Geologic Framework Model used in WMA A-AX Performance Assessment and RCRA Closure Analysis" (https://pdw.hanford.gov/document/AR-08984) The CCUz (Cold Creek Silt unit) underneath WMA A-AX has a variable thickness and is typically less than 15 ft deep. In the model this spatially variability in the makeup of the CCUz is neglected and the entire CCUz is treated as a homogeneous layer with hydraulic properties derived from collected CCUz samples. The impact of discontinuous fine-grained units under a WMA was evaluated at the request of Ecology in RPP-CALC-64255, "Results of Scoping, Sensitivity, and Heterogeneity Model Cases Requested by Ecology During Review of WMA C HFFACO IPA Documentation" (https://pdw.hanford.gov/download/v2/AR-14471). In this document a discontinuous suite of fine-grained units (see Figure 3-5 in RPP-CALC-64255) resulted in "All simulations that incorporated alternative interpretations of heterogeneity produced additional plume spreading over what was produced in simulation using the EHM model(s). The spreading resulted in a broadening of the fringes of the plume, resulting in a wider region of low concentration, but lower peak concentrations associated with the center of mass of the plume." a larger spreading of the vadose zone plume, but lower peak			

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					concentrations in groundwater." Given the proximity to WMA C, at WMA A-AX, it is expected that a discontinuous fine-grained unit would have similar spreading and reduction in peak groundwater concentrations.			
48.	Pages 7-19 to 7-28, Tables 7-5 through 7-9	Why was CLARC MTCA Method B Cancer (Eq. 720-2) (µg/L) value of 1.40E-01 for Hexavalent Chrome not been included in Table 7-5? Why is the Table 7-5 value for CLARC MTCA Method B noncancer for hexavalent chrome 1.40E-02 when the CLARC table (Feb 2025) is 1.40E+01? Why is there no Drinking Water Standard (MCL or mg/L) for hexavalent chrome?	Address hexavalent chrome values that conflict with the current CLARC table values. Check the calculated ELCR and Hazard Quotient values for hexavalent chrome in Table 7-5 and correct. CLARC (Feb 2025) gives a Ground Water Method B Potable Groundwater Cleanup Level value of 1.40E+00 (µg/L) for hexavalent chrome		The CLARC MTCA Method B cancer value for Hexavalent Chromium is included in Table 7-5 as footnote 'c'. When this issue was first raised for RPP-RPT-63929, Practicability Evaluation Request to Forego a Third Retrieval Technology for Tank 241-AX-103 (Enclosure to 22-NWP-180, comment 8), Ecology agreed with the Permitee Response that adding a footnote to the table was sufficient to cover cancer effects since Cr+6 is the only carcinogenic chemical to reach groundwater during the analysis. This is footnote 'c' in table 7-5. The value for CLARC MTCA Method B (noncancer) for hexavalent chromium in table 7-5 is 1.4×10-2 mg/L which converts to $1.4\times10^{+1}$ µg/L. There is no DWS listed in table 7-5 for hexavalent chromium because the CLARC table has no entry for hexevalent chromium in the "Maximum Contaminant Level Goal 40CFR141", "Federal Maximum Contaminant Level 40 CFR 141", or "Maximum Contaminant Level 246-290 WAC" columns.	12/1/2025: Mistake in response: Second paragraph, third line "…which converts to 1.4×101 µg/L." Needs superscript on exponent. E.g., 1.4 x 10+1 µg/L. Would need to see redline to verify/validate Permitee Response. 2/11/2026: Accept.	Close	GWP
49.	General Moderately long-lived daughter products of < 3 yr half lived rads in analysis	Section 7.1 Groundwater Impacts and elsewhere in the TWRWP cites RPP-ENV-61497: The PRELIMINARY PERFORMANCE ASSESSMENT OF WASTE MANAGEMENT AREA A-AX Rev.00: Covered on page 2-164 (263/1555),	Please comment on Moderately long-lived daughter products of < 3 yr half lived rads and their putative risk.		Ba-137m, Cs-134, Ru-106 and Y-90 all decay to stable elements. Antimony-125 decays to Te-125m, with a half life of 57.4 days, and Te-125m decays to stable Te. The remaining two radionuclides in table 2-15, Cm-242 and Th-228 are the heads of long decay chains. Among these progeny, there	12/1/2025: Agree on DOE statement about daughter radionuclides. 2-10-2026 Accept.	Close	GWP

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		Table 2-14 page 2-165 of RPP-ENV-61497 Rev.00. Table 2-15 has eliminated rads (Sb-124, Ba-137, etc.) since thy have a half life < 3yrs but give no explanation whether these short-lived rads have daughter products with moderate half lives that could be hazardous and add unacceptable risk.			are only 5 radionuclides that have half lives measured in years, and these have partition coefficients (Kd) that are above 10 ml/g. Any element with a Kd of 1 ml/g or greater will not reach groundwater in the 10,000 year simulation time frame. Uranium-234 is the 2nd daughter of Cm-242 and has a Kd of 0.6 ml/g, which means it would start appearing in the groundwater at the end of the 10,000 year simulation. The small inventory of Cm-242 in Tank A-103 would result in a negligble amount of U-234 being formed within 10,000 years. The list of radionuclides in Table 2-15 of RPP-RPT-61497, Rev. 0 and their progeny would likely not appear in the groundwater during the 10,000 year simulation used in this analysis.			
50.	General	RPP-ENV-58813, Rev.02 Exposure Scenarios for Risk Assessments in Tank Farms at the Hanford Site, Washington, Jul 03, 2024 is used extensively in Section 7.1.1.4 Exposure Scenarios, as well as in Section 7.1.1, Retrieval Leak Evaluation Methodology and Section 7.2, Inadvertent Intruder Risk. • RPP-ENV-58813, Rev.02 is a secondary document and not Ecology's basis for calculating soil concentrations protective of groundwater – Ecology uses WAC 173-340-747. • The EPA granted WA ECY state authority to manage its own RCRA program for non-radiological contaminants through the WAC, including WAC-173-303 and WAC-173-340. Ecology used WAC 173-303 and cited portions of WAC	For non-radiological contaminants, revise the document to be consistent with requirements in WAC 173-303 and cited portions of WAC 173-340 therein.	See comment for regulatory basis. See Modification Needed for actionable response.	4/24/26— The MTCA Method B groundwater numerical cleanup level at a 10-6 carcinogen risk level using WAC 173-340-720 Equation 720-2 is 0.14 µg/l (https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/contamination-cleanup-tools/clarc/data-tables). The report has been updated to use this numerical cleanup level to compute MTCA Method B ELCR for comparison in this report. In 2019 and 2020, the Tri-Parties developed DOE RL 2019 46, "Central Plateau Inner Area Cleanup Principles and Parameters" ("Principles and Parameters") to establish a standardized set of cleanup principles for the Inner Area of the Central Plateau that could be incorporated into work plans for Operating Units and SST WMAs. The objectives of Principles and Parameters are to (1) provide a consistent approach for assessment of risks to human health and the	6-11-2026: ECY appreciates the DOE disposition on 4-24-2026. However, it did not address the comment as explained in our previous response.	Open	GWP

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		173-340 for determining the concentrations of nonradiological contaminants that will be permitted to remain in environmental media at closure. • RPP-ENV-58813, Rev. 02 uses DOE/RL-2019-46 Central Plateau Cleanup Principles and Parameters document extensively, including modification of exposure scenarios associated with soil risk assessment.			environment and evaluation of remedial alternatives within the Inner Area; and (2) identify and implement regulatory strategies that would optimize resources, streamline documentation requirements, and promote consistency in decisions. The outcome of the initiative was the establishment of an overarching and consistent set of cleanup principles agreed to by the Tri-Parties as being the foundation for evaluating waste sites and making cleanup decisions for each of the SST WMAs. Accordingly, the Principles and Parameters were adopted and institutionalized in the TPA Action Plan, Appendix F, Supporting Technical Plans and Procedures. The substantive components of Principles and Parameters relate to land use, baseline risk assessment, applicable cleanup levels, and points of compliance. The Tri-Parties also agreed that DOE-RL-2019-46 will be included by reference or as an insert to RFI/CMS work plans for SST WMAs and, when added by reference, is fully enforceable as an essential part of the work plans for all Parties. The TWRWP includes a groundwater protection evaluation that is consistent with DOE RL 2019 46. For the protection of groundwater, DOE RL 2019 46 requires the use of Soil Screening Levels (SSLs) to identify COPCs and Preliminary Remediation Goals (PRGs) to establish groundwater cleanup levels. For SSLs, the applicable exposure model for non radiological chemicals is the EPA Tap Water Scenario. For PRGs, cleanup levels are based on the lower of State or Federal drinking water limits or MTCA Method B cleanup levels calculated using			

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					WAC 173 340 720 Equations 720 1 and 720 2. The TWRWP risk assessment does not calculate SSLs directly. Instead, it uses a site specific model incorporating the EPA Tap Water Scenario to evaluate groundwater protection. For non radiological, non carcinogenic chemicals, the SSL Hazard Index is compared to the permissible value of 1. For carcinogens, the SSL risk evaluation is compared to the allowable cumulative risk of 10^{-5} and individual risk of 10^{-6}. The TWRWP also does not compute PRGs directly. It compares peak simulated concentrations from the site specific model to PRG values already calculated and published in the State's CLARC tables (based on WAC 173 340 720 Equations 720 1 and 720 2). Equivalent comparisons are made for both non carcinogenic and carcinogenic chemicals. DOE presents both comparison methods to remain consistent with DOE RL 2019 46, without asserting that either approach is subordinate to the other. According to TPA Action Plan Appendix I Section 2.1.3, the purpose of the risk assessment in the TWRWP is "not make final retrieval or closure decisions" but to "aid operational decisions during retrieval activities". The results tables have been updated to include ELCR and HQ values derived using MTCA Method B. and the EPA Tap Water Scenario so that conclusions regarding operational decisions during retrieval activities can be made without excluding either method.			

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51.	Entire Document	The following documents are referenced or listed as references, but missing from the AR on Feb 4, 2026: HWS-5614 RPP-RPT-57252 RPP-RPT-42741 RPP-RPT-56866 HNF-SD-WM-OCD-015 RPP-29002 TFC-ENG-CHEM-P-47 TFC-ESHQ-ENV-STD-03 TFC-ESHQ-ENV-STD-04 TFC-ENG-STD-26 HNF-IP-1266 TFC-ESHQ-ENV-PP-C-11 TFC-OPS-WM-C-10 TFC-ENG-CHEM-P-57 RPP-32477 RPP-30121 TFC-ESHQ-ENV_FS-C-01 TFC-OPS-OPER-C-24 TFC-ESHQ-ENV-FS-C-01 RPP-PLAN-64245 RPP-16922 TFC-PLN-187 ESHQ-ENV_RM-C-04 TFC-ESHQ-ENV_PP-C TFC-ESHQ-ENV-PP-C-07 TFC-PLN-43 RPP-RPT-64273 RPP-RPT-63715 RPP-RPT-63078 DOE/ORP-2003-02 ECN-717436 PNNL-15782 RPP-RPT-59447 TFC-ESHQ-ENV_PP-C-07 TFC-ESHQ-ENV_PP-C-09 TFC-ESHQ-ENV_PP-C-11 TFC-ESHQ-ENV_RM-C-04 TFC-PLN-34	Listed documents should be placed in the AR		4/24/26 HWS-5614— This document is publicly available at https://reading-room.labworks.org/Files/GetDocument.aspx?id=D8783289 RPP-RPT-57252— Added to AR (AR-39568) RPP-RPT-42741-- With HLAN access, Ecology should be able to access the external interface of the TWINS database. The possibility of granting further access or resolving any access issues will be addressed by the characterization engineer. RPP-RPT-56866-- With HLAN access, Ecology should be able to access the external interface of the TWINS database. The possibility of granting further access or resolving any access issues will be addressed by the characterization engineer. HNF-SD-WM-OCD-015—Added to AR (AR-39573) RPP-29002—Added to AR (AR-39587). TFC-ENG-CHEM-P-47-- This document is an H2C procedure maintained internally by H2C operations and management and is generally not distributed outside the organization. This document was not considered or relied upon to arrive at any decision and does not represent an interim step in a decision-making process. Rather, this is an internal procedure, standard, or plan and, as indicated by the reference citation "Latest Revision," is a living document that may change frequently to address and adapt to internal operations and processes and operational needs.	6/112026: Ecology is extending the due date for this document request and all prior document requests where DOE has failed to comply by two more weeks from the date of the accompanying transmittal letter at which time these documents must be delivered to Ecology or placed in AR. When the documents are delivered H2C has the opportunity to request they be treated confidentially if some reason exists. After that point, any requested documents in prior RCRs that have not been provided to Ecology or marked 'accepted' by Ecology in prior RCRs will be reviewed for non-compliance with TPA and/or permit requirements as appropriate.	OPEN	JHD

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					Therefore, this document will not be added to the Administrative Record. TFC-ESHQ-ENV-STD-03-- This document is an H2C procedure maintained internally by H2C operations and management and is generally not distributed outside the organization. This document was not considered or relied upon to arrive at any decision and does not represent an interim step in a decision-making process. Rather, this is an internal procedure, standard, or plan and, as indicated by the reference citation "Latest Revision," is a living document that may change frequently to address and adapt to internal operations and processes and operational needs. Therefore, this document will not be added to the Administrative Record. TFC-ESHQ-ENV-STD-04-- This document is an H2C procedure maintained internally by H2C operations and management and is generally not distributed outside the organization. This document was not considered or relied upon to arrive at any decision and does not represent an interim step in a decision-making process. Rather, this is an internal procedure, standard, or plan and, as indicated by the reference citation "Latest Revision," is a living document that may change frequently to address and adapt to internal operations and processes and operational needs. Therefore, this document will not be added to the Administrative Record. TFC-ENG-STD-26-- This document is an H2C procedure maintained internally by H2C operations and management and is generally not distributed outside the organization. This document was not			

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					considered or relied upon to arrive at any decision and does not represent an interim step in a decision-making process. Rather, this is an internal procedure, standard, or plan and, as indicated by the reference citation "Latest Revision," is a living document that may change frequently to address and adapt to internal operations and processes and operational needs. Therefore, this document will not be added to the Administrative Record. HNF-IP-1266—Deleted from TWRWP. TFC-ESHQ-ENV-PP-C-11-- This document is an H2C procedure maintained internally by H2C operations and management and is generally not distributed outside the organization. This document was not considered or relied upon to arrive at any decision and does not represent an interim step in a decision-making process. Rather, this is an internal procedure, standard, or plan and, as indicated by the reference citation "Latest Revision," is a living document that may change frequently to address and adapt to internal operations and processes and operational needs. Therefore, this document will not be added to the Administrative Record. TFC-OPS-WM-C-10-- This document is an H2C procedure maintained internally by H2C operations and management and is generally not distributed outside the organization. This document was not considered or relied upon to arrive at any decision and does not represent an interim step in a decision-making process. Rather, this is an internal procedure, standard, or plan and, as indicated by the reference citation "Latest Revision," is a			

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					living document that may change frequently to address and adapt to internal operations and processes and operational needs. Therefore, this document will not be added to the Administrative Record. TFC-ENG-CHEM-P-57-- This document is an H2C procedure maintained internally by H2C operations and management and is generally not distributed outside the organization. This document was not considered or relied upon to arrive at any decision and does not represent an interim step in a decision-making process. Rather, this is an internal procedure, standard, or plan and, as indicated by the reference citation "Latest Revision," is a living document that may change frequently to address and adapt to internal operations and processes and operational needs. Therefore, this document will not be added to the Administrative Record. RPP-32477—Added to AR (AR-39572). RPP-30121— This document was transmitted to Ecology September 29, 2006 (ORP Memo 06-TPD-069). It was noted as archived 10/20/2006 EDMC. TFC-ESHQ-ENV_FS-C-01-- This document is an H2C procedure maintained internally by H2C operations and management and is generally not distributed outside the organization. This document was not considered or relied upon to arrive at any decision and does not represent an interim step in a decision-making process. Rather, this is an internal procedure, standard, or plan and, as indicated by the reference citation "Latest Revision," is a			

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					living document that may change frequently to address and adapt to internal operations and processes and operational needs. Therefore, this document will not be added to the Administrative Record. TFC-OPS-OPER-C-24-- This document is an H2C procedure maintained internally by H2C operations and management and is generally not distributed outside the organization. This document was not considered or relied upon to arrive at any decision and does not represent an interim step in a decision-making process. Rather, this is an internal procedure, standard, or plan and, as indicated by the reference citation "Latest Revision," is a living document that may change frequently to address and adapt to internal operations and processes and operational needs. Therefore, this document will not be added to the Administrative Record. TFC-ESHQ-ENV-FS-C-01—Corrected to TFCESHQ-ENV_FS-C-01 in TWRWP. RPP-PLAN-64245—Added to AR (AR-39570). RPP-16922—Sent 3/12/26 as part of an inspection response. TFC-PLN-187-- Already provided to Ecology as part of an inspection request 10/24/24 (**TOC-RORI-24-064 SST DR 1**). ESHQ-ENV_RM-C-04—Does not exist in the draft TWRWP. TFC-ESHQ-ENV_PP-C—Does not exist in the draft TWRWP.			

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					TFC-ESHQ-ENV-PP-C-07-- Corrected to TFC-ESHQ-ENV_PP-C-07 in TWRWP. TFC-PLN-43-- This document is an H2C procedure maintained internally by H2C operations and management and is generally not distributed outside the organization. This document was not considered or relied upon to arrive at any decision and does not represent an interim step in a decision-making process. Rather, this is an internal procedure, standard, or plan and, as indicated by the reference citation "Latest Revision," is a living document that may change frequently to address and adapt to internal operations and processes and operational needs. Therefore, this document will not be added to the Administrative Record. RPP-RPT-64273—Already in the administrative record. RPP-RPT-63715—Added to AR (AR-39564). RPP-RPT-63078—Added to AR (AR-39565). DOE/ORP-2003-02—Added to AR (.AR-39496). ECN-717436—Deleted from TWRWP. PNNL-15782—This document is publicly available at https://www.pnnl.gov/main/publications/external/technical_reports/PNNL-15782.pdf RPP-RPT-59447—Deleted from TWRWP.			

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					TFC-ESHQ-ENV_PP-C-07-- This document is an H2C procedure maintained internally by H2C operations and management and is generally not distributed outside the organization. This document was not considered or relied upon to arrive at any decision and does not represent an interim step in a decision-making process. Rather, this is an internal procedure, standard, or plan and, as indicated by the reference citation "Latest Revision," is a living document that may change frequently to address and adapt to internal operations and processes and operational needs. Therefore, this document will not be added to the Administrative Record. TFC-ESHQ-ENV_PP-C-09-- This document is an H2C procedure maintained internally by H2C operations and management and is generally not distributed outside the organization. This document was not considered or relied upon to arrive at any decision and does not represent an interim step in a decision-making process. Rather, this is an internal procedure, standard, or plan and, as indicated by the reference citation "Latest Revision," is a living document that may change frequently to address and adapt to internal operations and processes and operational needs. Therefore, this document will not be added to the Administrative Record. TFC-ESHQ-ENV_PP-C-11-- This document is an H2C procedure maintained internally by H2C operations and management and is generally not distributed outside the organization. This document was not considered or relied upon to arrive at any decision and does not represent an interim step in a decision-making process.			

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					Rather, this is an internal procedure, standard, or plan and, as indicated by the reference citation "Latest Revision," is a living document that may change frequently to address and adapt to internal operations and processes and operational needs. Therefore, this document will not be added to the Administrative Record. TFC-ESHQ-ENV_RM-C-04-- This document is an H2C procedure maintained internally by H2C operations and management and is generally not distributed outside the organization. This document was not considered or relied upon to arrive at any decision and does not represent an interim step in a decision-making process. Rather, this is an internal procedure, standard, or plan and, as indicated by the reference citation "Latest Revision," is a living document that may change frequently to address and adapt to internal operations and processes and operational needs. Therefore, this document will not be added to the Administrative Record. TFC-PLN-34—Deleted from TWRWP.			