



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

May 27, 2011

11-NWP-051

Mr. Christopher J. Kemp, Deputy Federal Project Director
United States Department of Energy
Office of River Protection
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Review of *Single-Shell Tank Waste Management Area C RCRA/CERCLA Integration White Paper*, RPP-PLAN-46459, Revision 1, for Fulfillment of Hanford Federal Facility Agreement and Consent Order (HFFACO) Milestone M-045-80

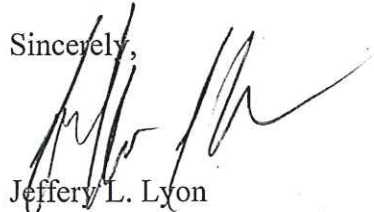
Dear Mr. Kemp:

Ecology reviewed the *Single-Shell Tank Waste Management Area C RCRA/CERCLA Integration White Paper*. This document is consistent with the expectations of HFFACO Milestone M-45-80, and the *Waste Management Area C Demonstration Project Plan*, RPP-46484, Revision 0.

The enclosed Review Comment Record contains our comments for your response and resolution. Disposition of these comments, and the update of the document, consistent with HFFACO Action Plan Section 9.2, can be discussed in the Waste Management Area C Farm Closure meetings.

If there are any questions, contact me at 509-372-7914.

Sincerely,



Jeffery L. Lyon
Tank Waste Storage Project Manager
Nuclear Waste Program

aa

cc: See page 2



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Reference: Letter 10-TPD-166, dated December 28, 2010, from T. W. Fletcher, USDOE-ORP, to J. A. Hedges, Ecology, "Submittal of Documentation in Fulfillment of Hanford Federal Facility Agreement and Consent Order (HFFACO) Milestones M-045-80 and M-045-81"

cc w/enc:

Dennis Faulk, EPA
John Martell, EPA
Bob Lober, USDOE
Scott Samuelson, USDOE
Bruce Sullivan, LMSI
Jennifer Ollero, MSA
Rob Piippo, MSA
Judy Vance, MSA
Janet Badden, WRPS
Susan Eberlein, WRPS
Steve Killoy, WRPS
Jeff Luke, WRPS
Scott Sax, WRPS
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Lela Buck, Wanapum
Russell Jim, YN
Susan Leckband, HAB
Ken Niles, ODOE
Administrative Record: Tank Waste Storage: M-45-80, M-045-81
Environmental Portal
USDOE-ORP Correspondence Control
WRPS Correspondence Control

REVIEW COMMENT RECORD

Date 05/27/11	Review No.
Project No.	Page 1 of 3

Document Number(s)/Title(s) <i>Single-Shell Tank Waste Management Area C RCRA/CERCLA Integration White Paper, RPP-PLAN-46459, Revision 1</i>	Program/Project/Building Number	Reviewer Andy Fitz	Organization/Group	Location/Phone
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Comment Submittal Approval: Agreement with indicated comment disposition(s) Status: _____

Organization Manager (Optional) _____ Date _____ Reviewer/Point of Contact _____ Date _____
 Author/Oriinator _____ Author/Oriinator _____

Item	Page #	Comment (s) (Provide technical justification for the comment and detailed recommendation of the action required to correct/resolve the discrepancy/problem indicated)	Hold Point	Disposition (Provide justification if NOT accepted)	Status
1.	Page 1, 2 nd paragraph	Insert the following "This paper describes [USDOE's proposal* for] how the dangerous..." and also as a foot note: "Until Ecology concurs in all aspects of paper."			
2.	Page 2, 3 rd paragraph	"... <i>Management Act of 1976</i> , and [at a minimum must be consistent with certain requirements of] RCW 70.105D,..."			
3.	Page 3, 2 nd paragraph	This paragraph should indicate this is only relevant to Past Practice unit actions, not TSD closure.			
4.	Page 3, 3 rd paragraph	"...of the Action Plan) or RPP or CPP units ..." reference to RPP is outdated, currently it is R-CPP.			
5.	Page 4, 1 st paragraph	"... RPP or CPP ..." reference to RPP is out dated, currently it is R-CPP.			
6.	Page 4, last paragraph to page 5	Last sentence on page, "The Agreement in Principle states that the parties agree to conclude discussions on these topics 60 days after the Consent Decree in Washington v. Chu, Case No. 08-5085-FVS is entered into court with an attempt to identify and agree upon HFFACO changes in this time frame. The Agreement in Principle also states that consultation with			

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		the Indian Nations and stakeholders will be offered and that a revised HFFACO will result after consideration of public comments, if appropriate." Update status, AIP negotiations have now concluded W/O Agreement.			
7.	Page 6, 2 nd paragraph	"This process parallels but is not directly applicable to the corrective action process defined in HFFACO Action Plan Section 7.4." This no longer parallels quite as closely due to CAD-ROD changes. Please modify text.			
8.	Page 6, 4 th paragraph	This is a key paragraph and its importance should be emphasized more. Please discuss your considerations of how to modify text or document.			
9.	Page 6, 5 th paragraph	"...and November 23, 1987 (for mixed waste)." The TPA reprint change package P-00-10-01 identifies the date as August 19, 1987, change date here to be consistent (see page 11).			
10.	Page 6, last paragraph	"....which is currently operating to remove waste for closure" the use of "currently operating", is not a preferred characterization of the unfit-for-use system that must close. One alternate to this is "...currently storing waste pending required closure....." Please revise text.			
11	Page 8, 1 st paragraph	"....Under the assumption that the WMA C is a tank system [WAC 173-303-640, Subsection (8)(b)] that will be closed as a landfill,...." This statement is not clear. If this is saying that a Cap & Post-Closure care will be required if Landfill (LF) closure is assumed – that would be an accurate statement. If this is saying that LF closure is the assumption moving forward (for example, for the purposes of framing the Performance Assessment risk assessment), then we can't make this assumption at this point. Ecology will need to discuss the evaluation of Clean Closure and Landfill closure decision-making requirements, both are still required. This analysis will help inform the determination of the practicability of Clean Closure and which will inform whether LF is justified. After discussions with Ecology, text clarification will be needed.			
12.	Table 1, page 9, footnotes a,	Footnotes: "a"- see previous page comment; "b" - Specifically WAC 173-340-7490, through -7494; "c" - what is justification for assuming Method C? Can't lock into method C yet this needs to be evaluated through corrective action			

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13.	b, and c Page 11, 3 rd paragraph	process. “...HFFACO and other requirements will be implemented.”, change “will” to “ <i>could</i> ”.			
14.	Page 13, 2 nd paragraph	“...place may be shown in future RFI/CMS or RI/FS process documents to require that pipeline interface points be isolated within the effective edge of the surface barrier prior to WMA C barrier placement, e.g., at a diversion box or along the pipe itself. The final design of the WMA C surface barrier may be the logical place to point to the location and actions to be taken at these 200-IS-1 OU pipeline interface points. Barrier design will be submitted to Ecology in the WMA C closure plan and approved through a modification to the Hanford Site-Wide Permit.” See comment for page 8, this seems to assume Landfill Closure.			

