



DEPARTMENT OF
ECOLOGY
State of Washington

Response to Comments

**207-A South Retention Basins Closure Plan
Permit Modification Request for the
*Hanford Facility Resource Conservation and
Recovery Act Permit, Dangerous Waste
Portion, Revision 8c, for the Treatment,
Storage, and Disposal of Dangerous Waste*
– May 9 through June 24, 2016**

Summary of a public comment period and responses to comments

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Response to Comments

207-A South Retention Basins Closure Plan Permit Modification Request for the *Hanford Facility* *Resource Conservation and Recovery Act Permit,* *Dangerous Waste Portion, Revision 8c, for the* *Treatment, Storage, and Disposal of Dangerous Waste* – May 9 through June 24, 2016

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INTRODUCTION

The Washington State Department of Ecology's Nuclear Waste Program (NWP) manages dangerous waste within the state by writing permits to regulate its treatment, storage, and disposal.

When a new permit or a significant modification to an existing permit is proposed, NWP holds a public comment period to allow the public to review the change and provide formal feedback. (See [Washington Administrative Code \[WAC\] 173-303-830](#) for types of permit changes.)

The Response to Comments is the last step before issuing the final permit, and its purpose is to:

- Specify which provisions, if any, of a permit will become effective upon issuance of the final permit, providing reasons for those changes.
- Describe and document public involvement actions.
- List and respond to all significant comments received during the public comment period and any related public hearings.

This Response to Comments is prepared for:

Comment period:	207-A South Retention Basins Closure Plan Permit Modification Request for <i>Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8c, for the Treatment, Storage, and Disposal of Dangerous Waste</i> , May 9 – June 24, 2016
Permit:	<i>Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion, Revision 8c, for the Treatment, Storage, and Disposal of Dangerous Waste</i> WA 7890008967
Permittees:	<i>United States Department of Energy (USDOE) and CH2M Hill Plateau Remediation Company (CHPRC)</i>
Original issuance date:	<i>September 27, 1994</i>
Effective date:	<i>October 6, 2016</i>

To see more information related to the Hanford Site and nuclear waste in Washington, please visit our website: www.ecy.wa.gov/programs/nwp.

REASONS FOR ISSUING THE PERMIT

The 207-A South Retention Basins (207-A SRB) is not currently in the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8c, for the Treatment, Storage, and Disposal of Dangerous Waste* (Site-wide Permit). A Closure Plan and unit-specific Permit Conditions have been prepared for this unit, so it can be closed out of the Hanford Site-wide Permit. A permit modification is required to add the Closure Plan and Permit Conditions to the Site-wide Permit.

PUBLIC INVOLVEMENT ACTIONS

NWP encouraged public comment on the 207-A SRB Class 3 permit modification during a 45-day public comment period held May 9 through June 24, 2016.

A public notice announcing the comment period was mailed to 1,510 interested members of the public. Copies of the public notice were distributed to members of the public at Hanford Advisory Board meetings.

A public announcement legal classified advertisement was placed in the *Tri-City Herald* May 8, 2016. A notice announcing the start of the comment period was sent to the [Hanford-Info email list](#), which has 1,836 recipients.

The Permittees' held a public meeting on August 5, 2015, during their public comment period from June 30 through August 28, 2015. A public hearing was not requested during Ecology's public comment period, and no public meeting was held during the May 9 through June 24, 2016, public comment period.

The Hanford information repositories located in Richland, Spokane, and Seattle, Washington, and Portland, Oregon, received the following documents for public review:

- Transmittal letter
- Draft unit-specific Permit Conditions
- Draft Part A form
- Draft Closure Plan
- Factsheet
- SEPA Determination of Non-Significance (DNS)
- Response to Comments document, Ecology Publication 16-05-009

The following public notices for this comment period are in Appendix A of this document:

1. Public notice (focus sheet)
2. Classified advertisement in the *Tri-City Herald*
3. Notice sent to the Hanford-Info email list

LIST OF COMMENTERS

Commenter Identification:

The table below lists the names of organizations or individuals who submitted a comment on the 207-A SRB Permit modification and where you can find Ecology's response to the comments.

Commenter	Organization	Comment Number	Page Number
<i>Conlan, Mike</i>	<i>Citizen</i>	<i>1</i>	<i>4</i>
<i>Jim, Russell</i>	<i>Environmental Restoration Waste Management (ERWM) Program Manager for Yakama Nation</i>	<i>2-73</i>	<i>4-29</i>

RESPONSE TO COMMENTS

Comments are listed by commenter. When possible, one response has been written for multiple comments with similar questions.

Description of Comments:

Comments in this document include comments received by Ecology on the 207-A SRB draft Class 3 permit modification public comment period from May 9 through June 24, 2016.

This section provides summary of comments that we received during the public comment period and our responses, as required by RCW 34.05.325(6)(a)(iii). Each comment is addressed separately. Ecology's responses directly follow each comment in italic font. Verbatim copies of all written comments are attached in [Appendix B](#).

Comment # 1 from Mr. Mike Conlan, Citizen, dated January 10, 2016:

- 1) Remove all nuclear waste,
- 2) Do not allow anymore nuclear waste into the facility,
- 3) Replace all the single storage tanks,
- 4) Stop all the nuclear leakage entering the Columbia River.

Ecology Response:

Thank you for your comment.

- 1. Ecology is working to ensure that long-term storage, treatment, and disposal of the waste is protective of human health and the environment.*
- 2. The proposed permit changes are not to allow new waste, but to better manage the waste already at Hanford.*
- 3. Single-shell tanks are not in the scope of this comment period. Ecology does agree the tanks pose a threat. We believe a better approach to addressing it is to remove the waste from the single-shell tanks and put it in the compliant double-shell tanks to prepare for eventual treatment in the Waste Treatment and Immobilization Plant now being built.*
- 4. Stopping any potential nuclear waste from impacting the Columbia River is not within the scope of the Closure Plan for 207-A SRB. Prevention of surface water impacts is addressed via operations associated with other units.*

Comment # 2 from Russell Jim, Yakama Nation, dated June 23, 2016:

Attachment #1:

YN ERWM Program (YN) comments (and requests) on the Class 3 Modification to the Hanford site RCRA Permit for Closure of the 207-A South Retention Basin Closure Plan

General:

- Providing the SEPA checklist for public review promotes better understanding of the SEPA process and enhances public knowledge of the unit. Please provide link to submitted SEPA checklists for all future permit modifications.

Ecology response:

Thank you for your comment. The SEPA checklist did go out for public comment as part of the Permittees' public comment period from June 30 through August 28, 2015. Ecology plans to add the SEPA checklist link in the factsheet for any future 207-A SRB related permit modifications.

Comment # 3 from Russell Jim, Yakama Nation, dated June 23, 2016:

- YN has previously provided our objection to the use of the Comprehensive Land-Use Plan (CLUP) and its provisions. It does not recognize YN Treaty Rights. All assessments and cleanup alternatives should be protective of, and based upon, anticipated Tribal subsistence uses.

Ecology response:

Thank you for your comment. The CLUP is a National Environmental Policy Act analyses that helped authorize USDOE's land use planning process for the Hanford Site. Ecology has previously recognized USDOE's land use planning for the Hanford Site as consistent with Ecology's definition of "Conducting land use planning under chapter 36.70A RCW" found at WAC 173-340-200. Ecology also notes that Benton County has incorporated USDOE's land use plan (pursuant to the CLUP) into Benton County's own land use plan.

Comment # 4 from Russell Jim, Yakama Nation, dated June 23, 2016:

- Factsheet should more clearly explain the temporary authorization process and provide a link to the document or ensure its availability on the Administrative Record.

Ecology response:

Thank you for your comment. Ecology agrees that a more detailed discussion of the temporary authorization process and providing a link to the document in the Administrative Record would be of value for heightened public understanding.

Original temporary authorization letter, 15-NWP-141, dated July 24, 2015:

<http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=1507280679>

180 day extension to the temporary authorization letter, 16-NWP-015, dated January 21, 2016:

<http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0078642H>

Comment # 5 from Russell Jim, Yakama Nation, dated June 23, 2016:

- Factsheet should also include the full text of WAC 173-303-830(4)(c)(ii)(F) which states the permittee's compliance history during the life of the permit being modified is available from the Department of Ecology contact person. Knowing the history of non-compliance can be helpful to understanding whether or not the permittee can demonstrate responsible decision-making. Ecology's summary to comment response "comment is noted" seems rather short. There is no explanation as to why a simple request to assist public understanding of permittee actions is being denied.

Ecology response:

Thank you for your comment. Ecology agrees with YN that the Permittees' factsheet should have contained the statement "The permittee's compliance history during the life of the permit being modified is available from the Department of Ecology contact person" per WAC 173-303-830(4)(c)(ii)(F).

Ecology did not intend to miscommunicate by stating “comment noted.” In this case, the phrase means agreement with the YN comment, and was not dismissal of the YN comment. For the purpose of the 207-A SRB response to comments document, Ecology replaces “comment noted” to read “Ecology agrees.”

Comment # 6 from Russell Jim, Yakama Nation, dated June 23, 2016:

- YN does appreciate the inclusions of hyperlinks where feasible.

Ecology response:

Thank you for your comment. Please understand that though Ecology does the best it can to maintain the hyperlinks, there is the possibility that one or more hyperlinks may become broken.

Comment # 7 from Russell Jim, Yakama Nation, dated June 23, 2016:

Chapter 4. YN does appreciate the over-all inclusion of additional design, process details, and site information.

Ecology response:

Thank you for your comment. The overall review process, including public comments provided by YN during the Permittees’ public comment period, helped to improve the final product.

Comment # 8 from Russell Jim, Yakama Nation, dated June 23, 2016:

Section 4.1:

In lines 4-5, please to add to end of sentence the following: *and contains compliance requirements necessary for conducting closure enforceable under the RCRA Permit.*

Ecology response:

Thank you for your comment. The 207-A SRB Closure Plan is an addendum to the Hanford Site-wide Permit and is therefore fully enforceable.

Comment # 9 from Russell Jim, Yakama Nation, dated June 23, 2016:

YN understands the Ecology is responsible for ensure proper corrective actions requirements for the entire Hanford Site and requests inclusion of the following text to line 28: *It is anticipated remedial actions for radioactive constituents shall be consistent with the closure activities required under WAC 173-303.*

Ecology response:

Thank you for your comment. Where and when required, Ecology does have authority to implement unit group specific corrective action under chapter 70.105 RCW, the Hazardous Waste Management Act and its implementing regulations, WAC 173-303. Corrective action is defined under WAC 173-303. Ecology is not the delegated authority to regulate radioactive constituents under these regulations. Any further cleanup will have to be completed under CERCLA and/or the Atomic Energy Act of 1954, as amended.

Comment # 10 from Russell Jim, Yakama Nation, dated June 23, 2016:

Section 4.1.1:

Please provide figure H-2-90783. It is referenced in both the Closure Plan and in the Responsiveness Summary. It is the basis of much information and is not readily available on the Administrative Record. There is no way to verify if design is per details without it (e.g., the liner and concrete were integrated to avoid preferential pathways to the soil column).

Ecology response:

Thank you for your comment. Drawing elements specific to closure of the 207-A SRB were incorporated into the text and figures of the closure plan.

Comment # 11 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarification is requested beyond Ecology responsiveness comment (i.e., the TPA change request C-07-02 is out of scope for this closure plan) as to why this information was not included on the timeline-Figure 1.

Ecology response:

Thank you for your comment. Removal of the 207-A SRB from the Tri-Party Agreement (TPA) per change notice C-07-02 appears to have been in error. The 207-A SRB is proposed to be reinstated in the TPA per a pending change notice.

Comment # 12 from Russell Jim, Yakama Nation, dated June 23, 2016:

Section 4.1.3: Clarify that listed waste codes will remain and appropriate treatments.

Ecology response:

Thank you for your comment. Both debris and soil generated during closure of the 207-A SRB must meet Environmental Restoration and Disposal Facility (ERDF) waste acceptance criteria, to be accepted for disposal.

Comment # 13 from Russell Jim, Yakama Nation, dated June 23, 2016:

Section 4.3:

Edit to include the following: Should there be changes in MTCA prior to closure, there will be no 'back-sliding' to less stringent cleanup levels. YN requests Ecology ensure enough flexibility within the closure permitting process to allow Ecology to retain its authority to set cleanup levels at more stringent levels and request additional characterization/cleanup to achieve these levels.

Ecology response:

Thank you for your comment. Under WAC 173-340-702(12)(a), Ecology is required to use the cleanup levels that apply to a release based on the rules in effect at the time the Ecology issues a final cleanup action plan for a given release. The Model Toxics Control Act (MTCA) Method B cleanup values for unrestricted land use (CLARC values) being compared for 207-A SRB closure soil sampling results are based on current science, available data, and are the current applicable required values.

Comment # 14 from Russell Jim, Yakama Nation, dated June 23, 2016:

YN requests the following closure performance standards be identified within the closure plan and the Permit:

Direct contact consistent with WAC 173-340-740(3)

Soil concentrations to protect groundwater: derived using WAC 173-340-747(4) (with an exception of modified method B for hexavalent chromium using a Kd value of 0.)

Protection of ecological receptors achieved through one of the following methods:

1. Excavation of contaminated soil to a minimum of 15 feet below ground surface, or
2. Excavation of contaminated soil such that residual soil concentrations do not exceed ecological screening levels listed in WAC 173-340-900 (Table 749-3), or
3. A site-specific demonstration that remedial standards eliminate threats to ecological receptors.

Ecology response:

Thank you for your comment. Based on this comment, Ecology has revised the 207-A SRB Closure Plan to include MTCA Method B standard soil concentrations protective of groundwater (see Section 4.6.2.2, Table 4). Site specific standards protective of ecological receptors are required in the event of a release, as described in WAC 173-340-7490(2). The closure plan is revised to discuss that if a release occurs, unit group specific terrestrial cleanup levels will be calculated and remedial actions continue until those cleanup levels are met. As indicated in Section 4.4.2 of the closure plan, excavation of any potential exceedances of MTCA Method B cleanup levels for soil will be conducted until confirmatory soil sampling returns compliant results.

Comment # 15 from Russell Jim, Yakama Nation, dated June 23, 2016:

Edit line 33 to read: *As required by the Washington State Dangerous Waste Regulations and the TPA Action Plan...affect soil.* Ecology's permitting authority lies with the Dangerous Waste Regulations of WAC 173-303, not the TPA Action Plan.

Ecology response:

Thank you for your comment. Ecology revised the closure plan (see section 4.3) to incorporate a revised version of the suggested comment.

Comment # 16 from Russell Jim, Yakama Nation, dated June 23, 2016:

YN reiterates its disagreement with use of the CLUP to determine land-use and/or cleanup standards. YN requests deletion of lines 13-18, page 4.14.

Ecology response:

Thank you for your comment. The CLUP is a National Environmental Policy Act analysis that helped authorize USDOE's land use planning process for the Hanford Site. Ecology has previously recognized the USDOE's land use planning for the Hanford Site as consistent with Ecology's definition of "Conducting land use planning under chapter 36.70A RCW" found at WAC 173-340-200. Ecology also notes that Benton County has incorporated USDOE's land use plan (pursuant to the CLUP) into Benton County's own land use plan.

Comment # 17 from Russell Jim, Yakama Nation, dated June 23, 2016:

Section 4.4.2:

Edit line 17 to delete following text: “and up to 1 m (3ft) or soil beneath the structure, which will meet the requirements of WAC 173-303-610(2)(b)(ii).” There is no guarantee that removal of only 3 ft of soil will suffice to meet clean closure requirements. Clarify the *observational approach* to sampling will be applied and soil removal will continue until cleanup standards are met or it has been demonstrated that all soil cannot be practicably removed or decontaminated.

Ecology response:

Thank you for your comment. The 2003 soil sampling data collected at 207-A SRB indicate no exceedances of MTCA Method B cleanup levels in soil up to 15 feet below ground surface. Section 4.4.2 of the closure plan states: “. . .Should sampling and analysis of the 207-A SRB indicate contamination at concentrations greater than the MTCA Method B unrestricted land use standards, additional soil removal will be performed underneath the storage cell floors to meet clean closure standards.” In Section 4.6.2 of the 207-A SRB Closure Plan, focused sampling is addressed. The closure plan states “Focused samples will also be collected at locations where there is evidence of potential leaks such as discoloration or staining.” Observed locations in the field which might signify a potential release point will be sampled as part of the closure process. The closure plan continues on line 13-14, that “Additional cleanup (e.g., removal of soil) will be performed at the focused sample locations that exceed the cleanup standard.” Ecology believes the closure plan sufficiently addresses sampling of observed locations for potential release as well as excavation of any potentially contaminated soils identified during the closure process.

Comment # 18 from Russell Jim, Yakama Nation, dated June 23, 2016:

Edit line 21: to read: *....unrestricted land use standards. Should there be changes in MTCA prior to closure, there will be no ‘back-sliding’ to less stringent cleanup levels.”*

Ecology response:

Thank you for your comment. Under WAC 173-340-702(12)(a), Ecology is directed to use the cleanup levels that apply to a release based on the rules in effect at the time the Ecology issues a final cleanup action plan for a given release. The MTCA Method B cleanup values for unrestricted land use being compared to soil sampling results are based on current science and available data, and are protective of human health and the environment for the closure of 207-A SRB.

Comment # 19 from Russell Jim, Yakama Nation, dated June 23, 2016:

YN notes that Table 4 contains only direct contact values. Edit Table 4 to include ecological protection values. YN also notes increase in closure performance standard for p-cresol from 4000 to 8000 and request use of lower value.

Ecology response:

Thank you for your comment. Per previous comment response, Table 4 has been updated to include MTCA Method B standard soil protective of groundwater cleanup levels that are regulatory requirements at the time this closure plan is issued.

Comment # 20 from Russell Jim, Yakama Nation, dated June 23, 2016:

Edit Table 4 to remove asterisk from analytes carbon tetrachloride and chloroform. This closure plan does not demonstrate removal of the Hypalon liner can be done intact and that there was no degradation of the liner.

Ecology response:

Thank you for your comment. Documentation of the condition of the liner has been added to the closure plan to be included as part of the closure verification package (see text added to Section 4.6.2.7).

Comment # 21 from Russell Jim, Yakama Nation, dated June 23, 2016:

This section seems to address only soil sampling, however the regulations require description of the steps needed to remove structures and confirmation of compliance with clean closure standards (WAC 173-303-640). Edit to clarify there will be visual inspection prior to commencement of closure activities. And that all visible staining (on the concrete) will be noted and samples taken at these locations.

Ecology response:

Thank you for your comment. The 207-A SRB are surface impoundments, not a tank system. The concrete was sampled in 2003. All debris generated during demolition has to meet ERDF waste acceptance criteria in order to be disposed of at that facility. As described in the closure plan, all soils are to be sampled using grid (statistical) sampling. Soils beneath areas where joints were located and any soils, which indicate the potential for a release (e.g., staining, discoloration, odor) will be sampled using additional focused sampling.

Comment # 22 from Russell Jim, Yakama Nation, dated June 23, 2016:

The presence of visible staining can be used as the basis for additional judgmental samples. The absence of visible staining cannot in general be used as the sole basis for concluding that contamination is absent.

Ecology response:

Thank you for your comment. If encountered, visible staining does require focused sampling, additional soil removal and additional confirmatory sampling. The grid sampling covers the 207-A SRB area under the basins and to the dangerous waste management unit boundary in order to maximize the chances of intercepting contamination, which is not visible.

Comment # 23 from Russell Jim, Yakama Nation, dated June 23, 2016:

Edit lines 31 to clarify that permit modification will be submitted in accordance with WAC 173-303-830.

Ecology response:

Thank you for your comment. The 207-A SRB Closure Plan has been modified to add the regulatory citation (see Section 4.6.2.8).

Comment # 24 from Russell Jim, Yakama Nation, dated June 23, 2016:

Edit lines 27-28 to clarify: what is meant by “where cracks in the elastomeric coating warrant sampling.”

Ecology response:

Thank you for your comment. If cracks in the elastomeric coating are identified, focused sampling is to be completed where indications of a release are observed. Grid sampling will provide overall sampling locations, which will also sample soil beneath areas of degraded elastomeric coating.

Comment # 25 from Russell Jim, Yakama Nation, dated June 23, 2016:

Section 4.5: Section 4.5.1:

Clarify the regulatory pathway for disposal of RCRA wastes at ERDF. Clarify this in other sections as indicated. Identify the disposal facility such that proper waste characterization according to the waste acceptance criteria of the receiving facility may be met.

Ecology response:

Thank you for your comment. The action memorandum (DOE-RL-2015-51, Rev. 0) describes the process for disposal of 207-A SRB wastes at ERDF. Wastes generated during the closure of 207-A SRB must meet the waste acceptance criteria for ERDF. The ERDF waste acceptance criteria are identified in WCH-191, Environmental Restoration Disposal Facility Waste Acceptance Criteria, Rev. 2. <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0084183>

Comment # 26 from Russell Jim, Yakama Nation, dated June 23, 2016:

Reader cannot locate Sections 5.2 & 6 within Chapter 4. Clarify.

Ecology response:

Thank you for your comment. The sections references are updated to 4.5.2 and 4.6, respectively.

Comment # 27 from Russell Jim, Yakama Nation, dated June 23, 2016:

Section 4.5.1.2-4.5.1.4 and Section 4.5.2-4.5.2.3.4:

Edit to provide additional detail descriptions regarding all waste management and disposal activities to clarify compliance with WAC 173-303-170 thru WAC 173-303-230 requirements. It is unclear how these regulations are being met (In general: Sections 4.5.2.1.2 & 4.5.2.3.2 are duplicative and incomplete. See comments below and provide more details.

Ecology response:

Thank you for your comment. Wastes will be disposed at ERDF as identified in the action memorandum, DOE-RL-2015-51, Rev. 0. Land Disposal Restriction (LDR) requirements are incorporated as an Applicable or Relevant and Appropriate Requirement (ARAR) in the action memorandum. Wastes must meet waste acceptance criteria for disposal at ERDF as described in WCH-191, Environmental Restoration Disposal Facility Waste Acceptance Criteria, Rev. 2. <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0084183>

Comment # 28 from Russell Jim, Yakama Nation, dated June 23, 2016:

Identify compliance requirements per WAC 173-303 within each waste management sections. Edit to include: How the nature and extent of contamination will be evaluated; potential types of equipment; detail of equipment decontamination; how additional sampling efforts will be conducted; details to demonstrate compliance with the regulations stated.

Ecology response:

Thank you for your comment. The level of detail currently provided in the closure plan for the closure of 207-A SRB regarding the listed items is sufficient.

Comment # 29 from Russell Jim, Yakama Nation, dated June 23, 2016:

Edit (and throughout Closure Plan as needed) to include container management regulations and details of how compliance with these requirements are met. In Section 4.5.2.3.4, provide details as to training, etc of ‘a waste specialist.’

Ecology response:

Thank you for your comment. The 207-A SRB is a closing surface impoundment dangerous waste management unit (DWMU), and is not a closing container storage DWMU. A training matrix was added to the closure plan in Section 4.5.4.

Comment # 30 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify what is meant by “miscellaneous solid waste will be managed as appropriate for the nonradiological and radiological contaminants present or suspected to be present.”

Ecology response:

Thank you for your comment. Types of miscellaneous waste are identified in Section 4.5.2.1 of the closure plan. The closure plan has been modified to specify management of miscellaneous solid waste.

Comment # 31 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify which information regarding newly generated wastes, etc will be record in the Hanford Site Waste Information Tracking system, and recorded unit-specific facility operating record.

Ecology response:

Thank you for your comment. This activity is covered by the Permittees’ standard operating procedures and is not part of the 207-A SRB Closure Plan.

Comment # 32 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify that the IQRPE’s report will be retained in the unit specific operating record and the Administrative Record.

Ecology response:

Thank you for your comment. This information is covered by Section 4.9 of the closure plan.

Comment # 33 from Russell Jim, Yakama Nation, dated June 23, 2016:

Delete any text which states or implies that the waste will be treated as need to meet LDRs.” Throughout the document, it is unclear as to how the LDRs are to be met and which debris standards are applicable. Provide details as to the disposal facility, where and how treatment for LDRs will be performed and storage locations prior to disposal. Identify anticipated waste treatments types (e.g. Section 4.5.2.3.6).

Ecology response:

Thank you for your comment. Wastes will be disposed of at ERDF as identified in DOE-RL-2015-51, Rev. 0. Wastes must meet waste acceptance criteria for disposal at ERDF as described in WCH-191, Environmental Restoration Disposal Facility Waste Acceptance Criteria, Rev. 2.
<http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0084183>

Comment # 34 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify statement regarding storage of dangerous wastes (e.g., Sections 4.5.2.1.2 & 4.5.2.3) at Hanford TSD units permitted to operate as container storage areas or a less than 90-day storage area prior to disposal. The scheduled closure of a RCRA TSD includes its waste disposal. Disposal be within 180 days unless an extension is granted. Clarify if there is any intent or possibility that closure activities include waste storage at a RCRA container storage area beyond 180 days. Furthermore, LDR storage provisions state allowance of storage for only the time necessary for treatment.

Ecology response:

Thank you for your comment. No waste is anticipated to be stored at a 90-day storage area for longer than 90 days prior to disposal at ERDF.

Comment # 35 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify if ‘roll-off’ containers will be reused and process for their decontamination.

Ecology response:

Thank you for your comment. Wastes must meet waste acceptance criteria for disposal at ERDF as described in WCH-191, Environmental Restoration Disposal Facility Waste Acceptance Criteria, Rev. 2. Standard operating procedures, though implemented and followed by the ERDF contractor, are not part of the 207-A SRB Closure Plan.
<http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0084183>

Comment # 36 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify how the waste profile maybe adjusted. Any new waste codes cannot be assigned without a modification to the Part A form.

Ecology response:

Thank you for your comment. The closure plan has been modified to indicate that any additional waste codes identified during waste profiling for disposal at ERDF require updating the Part A form (see Section 4.5.2.3.5).

Comment # 37 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify specific treatments to be used for each anticipated form of demolition wastes. Provide details as to how and where treatment activities will be conducted.

Ecology response:

Thank you for your comment. Disposal and any potential treatments must follow the action memorandum, DOE/RL-2015-51, Rev. 0, and ERDF disposal criteria as described in WCH-191, Environmental Restoration Disposal Facility Waste Acceptance Criteria, Rev. 2.
<http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0084183>

Comment # 38 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify maximum wind speeds for application of dust fixatives.

Ecology response:

Thank you for your comment. For the 207-A SRB excavated soil management, if soils are not direct loaded into ERDF containers, soil fixatives and water spraying are anticipated to be used regardless of wind speed.

Comment # 39 from Russell Jim, Yakama Nation, dated June 23, 2016:

Section 4.5.16: Delete all text, which states only 3ft of soils will be removed and demolition is considered complete, and rewrite to state the observational approach will be followed. See previous comment.

Ecology response:

Thank you for your comment. After removal of three feet of soil beneath the 207-A SRB, grid and focused sampling will be used to determine if cleanup standards have been met. If exceedances of cleanup standards are identified, then that additional soil is to be excavated, removed, disposed, and confirmatory soil sampling is to be completed to assure the cleanup standards have been met.

Comment # 40 from Russell Jim, Yakama Nation, dated June 23, 2016:

Section 4.5.2.3.7: Edit recordkeeping to clarify compliance with WAC 173-303-380 requirement and include that these records will be placed in the Administrative Record for the unit. Include statement that sampling logbooks and sampling data and training records will also be retained in the unit's Administrative Record.

Ecology response:

Thank you for your comment. Documentation required for closure is covered in Section 4.9 of the closure plan.

Comment # 41 from Russell Jim, Yakama Nation, dated June 23, 2016:

Section 4.5.4: Include training matrix tables for personnel. Include the minimum training requirements for all samplers.

Ecology response:

Thank you for your comment. A training matrix was included in the closure plan (see Section 4.5.4).

Comment # 42 from Russell Jim, Yakama Nation, dated June 23, 2016:

Sections 4.6-4.6.2.8:

Develop a unit-specific QA/QC plan to ensure all information, data, and resulting decisions are technically sound, statistically valid, and properly documented which includes data verification criteria such that it can be determined whether each individual data element is acceptable for its intended decision-making purpose. Ensure the QA/QC plan contains a Data Quality Assurance Plan. Ensure its consistency with Ecology Publication #09-05-007 [Guidance for Preparing Waste Sampling and Analysis Documents and QA/QC Requirements at Nuclear Waste Sites.

The closure plan must establish specific data acceptance criteria that ensure that data meeting the criteria will result in closure decisions within an acceptable degree of uncertainty. Data that do not meet the acceptance criteria must be rejected, even if the Ecology notification and discussion takes place as described. The quality assurance project plan should also address the circumstance when the quantity of acceptable data fails to meet the completeness criterion established as part of the data acceptance tests, and what corrective action is to be taken when the completeness criterion is not met.

The specific methods, agreements, and procedures to be used must be documented or referenced in the closure plan. Otherwise, Ecology has no basis to evaluate whether or not data from sampling conducted “consistent with laboratory agreements, laboratory analytical procedures, and HASQUARD” are adequate or appropriate to the specific decisions to be made under this closure plan.

Ecology response:

Thank you for your comment. Analytical work will be performed in compliance with the guidance set forth in the current version of the “Hanford Analytical Services Quality Assurance Requirements Document” (HASQUARD; DOE/RL-96-68, Rev. 4).

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL1-04.pdf>
<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL2-04.pdf>
<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL3-04.pdf>
<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL4-04.pdf>

Analytical methods and procedures will be performed at laboratories that are accredited by the state of Washington. Section 9.6 of the TPA identifies sampling and analytical requirements. Analytical data delivery schedules are included in Section 9.6.6 of the TPA. Soil sample locations and procedures for 207-A SRB closure are discussed in Section 4.6.2 and detailed in Appendix A (Addendum A) of the draft 207-A SRB Closure Plan.

Comment # 43 from Russell Jim, Yakama Nation, dated June 23, 2016:

In the SAP:

Edit to include text to clarify the required documentation of the specific procedures and equipment that will be used for the proposed treatment, including any sampling and analysis requirements that may be used to verify successful required treatment of LDR wastes. Clarify that all data-not just the listed analytes-will be entered into HEIS.

- Clarify the following area included (edit as necessary) as information to be retained:
- Confirmation records.
- Waste information (e.g. manifest numbers)
- Waste sampling records and associated documentation.
- Laboratory records and associated documentation.
- Documentation regarding waste re-evaluation frequencies.
- Special waste analysis requirement documentation.

Ecology response:

Thank you for your comment. Many of the items listed above would be part of a Waste Analysis Plan, which the 207-A SRB is not required to have as a closing unit. All necessary sampling and analytical information required for closure is included in the draft closure plan (see Section 4.6). “Hanford Environmental Information System” (HEIS) requirements are not part of the 207-A SRB Closure Plan. However, the Permittees’ do have standard operating procedures, which govern data entry into HEIS. Access requirements to Hanford data and databases are also identified in the TPA, Section 9.6.5.

Comment # 44 from Russell Jim, Yakama Nation, dated June 23, 2016:

Edit to include immediate (or within 7 days) notification to Ecology of corrective actions applied to field activities.

Ecology response:

Thank you for your comment. Corrective action reports in the 207-A SRB are not corrective action as defined in WAC 173-303, the corrective action reports identified in Section 4.6.2.7 are for additional soil removal if exceedances of soil cleanup levels are identified.

Comment # 45 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify if the following are evaluated: The parameters for which each environmental media sample will be analyzed and the rationale for selecting these parameters and the frequency with which analysis of a waste will be reviewed, or repeated, to ensure that the analysis is accurate and current. [WAC 173-303-300(5)(a)]

Clarify if the following are evaluated: Procedures for how non-detects, and any tentatively identified compounds which may be reported with laboratory analytical results will be assessed and/or used for decision-making purposes, and to identify any contaminants in addition to those already identified for which establishment of closure performance standards may be warranted. [WAC 173-303-300(5)(a)]

Methods of obtaining representative samples of soils for all sampling and analysis, which may be, required pursuant to WAC 173-303-110 requirements and consistent with the requirements specified in WAC 173-340-810 and WAC 173-340-820. [WAC 173-303-300(5)(c)]

Ecology response:

Thank you for your comment. Analytical work will be performed in compliance with the guidance set forth in the current version of the HASQARD; DOE/RL-96-68, Rev. 4.

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL1-04.pdf>
<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL2-04.pdf>
<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL3-04.pdf>
<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL4-04.pdf>

Soil sampling must be conducted as outlined in the draft 207-A SRB Closure Plan (Section 4.6.2) and per the Permittees’ standard operating procedures.

Comment # 46 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify why closure actions do not include scabbling of all discolored or staining areas identified on the concrete structure.

Ecology response:

Thank you for your comment. No scabbling is required during closure because all of the infrastructure will be removed for disposal at ERDF.

Comment # 47 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify that judgmental sampling is equivalent to focus sampling for those areas of concern identified during the visual inspection.

Ecology response:

Thank you for your comment. Focused sampling is distinguished from probability-based (grid) sampling in that inferences are based on professional judgment (i.e. judgmental sampling), not statistical scientific theory. Focused sampling and judgmental sampling are considered biased sampling and therefore cannot be statistically demonstrated to meet the MTCA Method B closure performance standards (cleanup levels for unrestricted land use) proposed for the 207-A SRB closure. The decision criteria for the focused sampling results will be a direct comparison to ensure individual values do not exceed the MTCA Method B clean-closure performance standards (cleanup levels for unrestricted land use).

Comment # 48 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify which field changes made during sampling are considered unexpected events and how they are to be dealt with.

Ecology response:

Thank you for your comment. The Permittees will notify Ecology if they encounter circumstances not covered by the Closure Plan. Depending on the nature of the deviation, Ecology will make a decision to document the changes in the field notebooks covering the closure activities and in the closure certification package, or will require a permit modification. Ecology will be notified of all changes requiring deviation from the Sampling and Analysis Plan (SAP) in the Closure Plan.

Comment # 49 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify what are ‘established sampling practices,’ etc as discussed in Section 4.6.2.1

Ecology response:

Thank you for your comment. “Established sampling practices” refers to the United States Environmental Protection Agency (EPA) accepted methods.

Comment # 50 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify what is meant by “all wastes (including unexpected wastes) generated by sampling activities will be managed in accordance with applicable regulations” (Section 4.6.2.1).

Ecology response:

Thank you for your comment. The closure plan has been revised to replace “applicable regulations” with more specific details in Section 4.6.2.1.

Comment # 51 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify in Section 4.6.2.1 that subsurface sampling is not deemed necessary *at this point in time.*

Ecology response:

Thank you for your comment. Based on soil sampling results from 2003, taken to 15 feet below ground surface, a release does not appear to have occurred. If closure sampling confirms no releases or detectable contamination above the MTCA Method B cleanup standards in the Closure Plan, no additional sampling at 207-A SRB for dangerous waste would be anticipated in the future. However, future soil sampling for dangerous waste related to closure of piping not included as part of the 207-A SRB closure, but adjacent to the unit, or radiological sampling within the 207-A SRB unit boundary, are possible future activities.

Comment # 52 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify the process for removal of soils surrounding the ‘node location.’ Confirm that the observational approach will be applied to the vertical and lateral extent of contamination above clean closure levels.

Ecology response:

Thank you for your comment The Permittees are using the “Visual Sampling Plan” (VSP) to determine sampling locations. If statistical sampling is selected, the VSP generates a grid based on input specific to the area to be sampled. The term “node location” is the sampling location generated by VSP and corresponds to the point(s) in the grid identified as locations to collect samples. Samples are to be collected consistent with HASQARD, DOE/RL-96-68, Rev. 4, the closure plan, and according to the permittees sampling procedures.

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL1-04.pdf>

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL2-04.pdf>

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL3-04.pdf>

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL4-04.pdf>

Comment # 53 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify and ensure that concept regarding “document version control” is through the permit modification process, not a non-specific administrative document control process.

Ecology response:

Thank you for your comment. Ecology has configuration control of the Hanford Site-wide Permit and documents submitted are managed through the permit modification process.

Comment # 54 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify what is meant by “sampling will be performed in accordance with established sampling practices.”

Ecology response:

Thank you for your comment. Established sampling practices for sampling refers to EPA accepted methods, included in the WAC 173-303 and WAC 173-340 regulations by reference.

Comment # 55 from Russell Jim, Yakama Nation, dated June 23, 2016:

Clarify that should a target analyte be detected at or above clean closure levels but less than the PQL or the analytical method, the lab will be asked to evaluate and lower the PQL.

Ecology response:

Thank you for your comment. As proposed in the closure plan, PQLs anticipated to be used by the analytical laboratory for analytes in soil sampled are less than potential cleanup levels for closure of the 207-A SRB.

Comment # 56 from Russell Jim, Yakama Nation, dated June 23, 2016:

Provide references to generalized internal work requirements and processes.

Ecology response:

Thank you for your comment. Analytical laboratory procedures must be consistent with HASQARD, DOE/RL-96-68, Rev. 4

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL1-04.pdf>

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL2-04.pdf>

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL3-04.pdf>

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL4-04.pdf>

and requirements in WAC 173-303-610(2) and WAC 173-340-700 through -760, excluding 173-340-745.

Comment # 57 from Russell Jim, Yakama Nation, dated June 23, 2016:

Identify the percentage of data to be validated.

Ecology response:

Thank you for your comment. The percentage of data to be evaluated is 5%, as indicated in Section 4.6.2.5 of the closure plan.

Comment # 58 from Russell Jim, Yakama Nation, dated June 23, 2016:

Edit Table 5 schedule to provide the time required for intervening closure activities.

Ecology response:

Thank you for your comment. Table 6 in the closure plan schedule provides sufficient detail for the planned activities.

Comment # 59 from Russell Jim, Yakama Nation, dated June 23, 2016:

Section 4.9:

More details are needed for clarification that the information will be documented in the Hanford Facility Operating Records and maintained until final closure of the facility including completion of any required post closure care or corrective action

Ecology response:

Thank you for your comment. The certified IQRPE evaluation must be approved by Ecology in order to close the unit group. Determinations by Ecology submitted to the USDOE are maintained in the unit group operating record and the Administrative Record.

Comment # 60 from Russell Jim, Yakama Nation, dated June 23, 2016:

Include results of data reviews as part of the minimum information to be placed in the Administrative record to support closure certification and Ecology determinations.

Ecology response:

Thank you for your comment. Data validation and compliance with cleanup levels is part of the certified IQRPE evaluation, which must be approved by Ecology in order to close the unit group. Determinations by Ecology submitted to USDOE are maintained in the unit group operating record and the Administrative Record.

Comment # 61 from Russell Jim, Yakama Nation, dated June 23, 2016:

Edit to clarify there is no anticipated future use of the 207-A SBR Area.

Ecology response:

Thank you for your comment. Once the unit is clean closed, there may be additional non-dangerous waste cleanup activities needed. Therefore, the 207-A SRB unit area is anticipated to remain restored consistent with WAC 173-303-610(2)(a)(iii) after backfilling until all cleanup actions are complete.

Comment # 62 from Russell Jim, Yakama Nation, dated June 23, 2016:

Attachment #2:

YN requests review and inclusion of the following text in the development of a QA/QC Plan:

A quality assurance/quality control (QA/QC) plan, or equivalent, to document all monitoring procedures to ensure that all information, data, and resulting decisions are technically sound, statistically valid, and properly documented. Each QA/QC plan shall include, or contain a reference to another document, which will be used and includes, the elements as defined.

Each QA/QC plan shall contain a Data Quality Assurance Plan that includes the following:

- Data Collection Strategy section including, but not limited to, the following:
- A description of the intended uses for the data, and the necessary level of precision and accuracy for those intended uses; and,
- A description of methods and procedures to be used to assess the precision, accuracy, and completeness of the measurement data;
- Sampling section that shall include or describe, and reference or cite:
- Criteria for selecting appropriate sampling locations, depths, etc., or identification and justification of sample collection;
- Sampling methods including the identification of sampling equipment and a description of decontamination procedures to be used;
- Criteria for providing a statistically sufficient number of samples as defined in EPA guidance, or criteria for determining a technically sufficient number of measurements to meet the needs of the project as determined through the Data Quality Objective (DQO) planning process;
- Methods for, or specification of, measuring all necessary ancillary data;
- Criteria for establishing, or specification of, which parameters are to be measured at each sample collection point, and the frequency that each parameter is to be measured;

- Criteria for, or specification of, identifying the type of sampling (e.g., discrete), and number of samples to be collected;
- Criteria for, or specification of, measures to be taken to prevent contamination of the sampling equipment and cross contamination between sampling points;
- Methods and documentation of field sampling operations and procedure descriptions, as appropriate, including:
 - Procedure descriptions and forms for recording the exact location, sampling conditions, sampling equipment, and visual condition of samples;
 - Calibration of field devices (as applicable);
 - Collection of replicate samples;
 - Submission of field-biased blanks, where appropriate;
 - Potential interferences present at the facility;
 - Field equipment listing and sample containers;
 - Sampling order; and,
 - Descriptions of decontamination procedures.
- Selection of appropriate sample containers, as applicable;
- Sample preservation methods, as applicable; and,
- Chain-of-custody procedure descriptions as applicable, including:
 - Standardized field tracking reporting forms to establish sample custody in the field prior to, and during shipment, and,
 - Pre-prepared sample labels containing all information necessary for effective sample tracking, except where such information is generated in the field, in which case, blank spaces shall be provided on the pre-prepared sampling label.
- Certification that all samples obtained for analysis will be delivered to a responsible person, at the recipient laboratory, who is authorized to sign for incoming field samples, obtain document of shipment, and verify the data entered onto the sample custody records;
- Provision for a laboratory sample custody log; and,
- Specification of chain-of-custody procedures or sample handling, storage, and disbursement for analysis.
- Sample storage procedure descriptions and storage times;
- Sample preparation methods;
- Descriptions of analytical procedures, including;
 - Scope and application of the procedure;
 - Sample matrix;

- Potential interferences;
- Precision and accuracy of the methodology; and,
- Method detection limits.
- Descriptions of calibration procedures and frequency;
- Data reduction, validation, and reporting;
- Internal laboratory quality control checks, laboratory performance, and systems audits and frequency, include:
 - Method blank(s);
 - Laboratory control sample(s);
 - Calibration check sample(s);
 - Replicate sample(s);
 - Matrix-spiked sample(s);
 - “Blind” quality control;
 - Control charts;
 - Surrogate samples;
- Each QA/QC plan shall include a Data Management Plan, or equivalent, to document and track data and results. [WAC 173-303-380(1)(f)]. This plan shall identify and establish data documentation materials and procedures, project or unit file requirements, and project-related progress reporting procedures and documents. The storage location for the raw data shall be identified. The plan shall also provide the format to be used to record and, for projects, present the validated and invalidated data and conclusions.
- The Data Management Plan shall include the following as applicable:
 - A data record including the following:
 - Unique sample or field measurement code;
 - Sampling or field measurement location including surveyed horizontal coordinates and elevation of the sample location, and sample or measurement type;
 - Sampling or field measurement raw data;
 - Laboratory analysis identification (ID) number;
 - Result of analysis (e.g., concentration);
 - Tabular displays, as appropriate, illustrating:
 - Unsorted validated and invalidated data;
 - Results for each medium and each constituent monitored;
 - Data reduction for statistical analysis;

- Sorting of data by potential stratification factors (e.g., location, soil layer, topography); and,
- Summary data.
- Graphical displays (e.g., bar graphs, line graphs, area or plan maps, isopleth plots, cross-sectional plots or transects, three dimensional graphs, etc.), as appropriate, presenting the following:
 - Displays of sampling location and sampling grid;
 - Identification of boundaries of sampling area and areas where more data is required;
 - Displays of concentrations of contamination at each sampling location;
 - Displays of geographical extent of contamination;
 - Aerial and vertical displays of contamination concentrations, concentration averages, and concentration maxima, including isoconcentration maps for contaminants found in environmental media at the Facility;
 - Illustrations of changes in concentration in relation to distance from the source, time, depth, or other parameters;
 - Identification of features affecting intramedia transport and identification of potential receptors.

QA personnel and technical experts evaluate the laboratory through onsite observations and/or reviews of the following documentation: copies of the QA/QC documents; records of surveillance/inspections; audits; non-conformances, and corrective actions. The 276-BA Organic Storage Area TK-ISO East operating organization ensures independent organization; QA personnel and technical experts and qualified to perform these evaluations.

The overriding goal of the analytical program is to support the accurate designation of waste and/or demonstrate compliance to LDR standards. The certified laboratory QA/QC programs will be designed to meet the following objectives:

Minimize errors. Errors may be introduced during preparative, analytical, and/or reporting phases of work. QC program elements include analyses of samples in accordance with procedures.

The designation of waste relies on a combination of Knowledge, historical data, and additional analytical data. Laboratory QA/QC programs ensure accurate, precise, reliable, and reproducible data.

Key QA program elements are designed to provide objective evidence that waste analysis methods meet the performance specifications. QA activities and implementation responsibilities are as follows:

- Activity based laboratory inspections. Inspections will be performed by trained operating unit operating personnel. Inspections verify that specific guidelines, specification, and procedures for the activities are completed successfully.
- Laboratory analyses. Analyses will be performed by onsite or offsite laboratories on samples of waste using procedures identified in Table 3.

- Development of inspection checklists. Checklists are required for laboratory inspections and are designed to ensure that the inspected activity is consistently addressed. Checklists will be completed during the inspection to document results.
- Instrument calibration and calibration verification. These activities are performed by the laboratory and are required for ensuring data of known accuracy and precision. Calibration data will be maintained and stored to ensure traceability to reported results.
- Laboratory QA/QC inspection results and instrumental calibrations will be documented in the unit-specific Administrative Record files.

Ecology response:

Thank you for your comment. Analytical work will be performed in compliance with the guidance set forth in the HASQARD; DOE/RL-96-68, Rev. 4.

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL1-04.pdf>

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL2-04.pdf>

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL3-04.pdf>

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL4-04.pdf>

Analytical methods and procedures will be performed at laboratories that are accredited by the state of Washington.

Section 9.6 of the TPA identifies sampling and analytical requirements. Analytical data delivery schedules are included in section 9.6.6 of the TPA. Soil sample locations and procedures for 207-A SRB closure are discussed in Section 4.6.2 and detailed in Appendix A of the draft Closure Plan.

**Comment # 63 from Russell Jim, Yakama Nation, dated June 23, 2016:
Laboratory Quality Assurance/Quality Control**

All analytical work will be defined and controlled by a statement of work or work order. These authorization documents will include QA/QC performance requirements. Samples will be handled according to controlled laboratory procedures. The accuracy, precision, and limitations of the analytical data are evaluated through QC performance parameters.

The unit group's operating organization will conduct review analyses to determine completeness of information and whether waste meets the acceptance criteria for treatment, storage, or disposal at one of the Hanford Facility TSD units or those of a chosen offsite TSD facility.

Data Assessment

Data used for decision making will be scientifically sound, of known quality, and thoroughly documented. Data will be assessed to determine compliance with the following:

Precision – The overall precision will be the agreement among the collected samples (duplicates) for the same parameters, at the same location, subjected to the same preparative and analytical techniques. Analytical precision will be the agreement among individual test portions taken from the same sample, for the same parameters, subjected to the same preparative and analytical techniques.

Accuracy – Accuracy of the measurement system will be evaluated by using QA samples, including certified standards, in-house standards, and proficiency testing samples.

Representativeness – Representativeness addresses the degree to which the data accurately and precisely represent a real characterization of the waste stream, parameter variation at a sampling point, sampling conditions and the environmental conditions at the time of sampling. The issue of representativeness is addressed for the following points:

- Based on the generating process, the waste stream, and its volume, there is an adequate number of sampling locations selected;
- The representativeness of selected media has been defined accurately;
- The sampling and analytical methodologies as defined in Table 3;
- The environmental conditions at the time of sampling will be documented in accordance with recordkeeping requirements.

Completeness – Completeness is the amount of usable data obtained from a measurement system compared to the total amount of data requested. The degree of completeness required for decision making must be defined in the statement of work or work order.

Comparability – Comparability is the confidence with which one data set can be compared to another. When comparability of data sets is a defined basis for decision making, the confidence level requirement must be specified in the statement of work or work order.

Ecology response:

Thank you for your comment. Analytical work will be performed in compliance with the guidance set forth in the current version of the HASQARD; DOE/RL-96-68, Rev. 4.

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL1-04.pdf>

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL2-04.pdf>

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL3-04.pdf>

<http://www.hanford.gov/files.cfm/DOE-RL-96-68-VOL4-04.pdf>

Analytical methods and procedures will be performed at laboratories that are accredited by the state of Washington.

Section 9.6 of the TPA identifies sampling and analytical requirements. Analytical data delivery schedules are included in section 9.6.6 of the TPA. Soil sample locations and procedures for 207-A SRB closure are discussed in Section 4.6.2 and detailed in Appendix A of the draft Closure Plan.

Comment # 64 from Russell Jim, Yakama Nation, dated June 23, 2016:

Attachment #3:

YN ERWM PROGRAM (YN) comments (and requests) on the Class 3 Modification to the Hanford Site RCRA Permit for closure of the 207-A South Retention Basin Permit Conditions

Introduction: While not enforceable, the introduction should present the relevant facts of unit operations and closure activities, please provide more details to include the following as well as definitions and application of all acronym terms.

- Clarify to include that 242-A Evaporator waste stream was from the DST.

- Include explanation of temporary authorization as the work was performed under this decision.
- Explain briefly the MTCA and SEPA processes.
- Explain the waste acceptance criteria at the Environmental Restoration Disposal Facility or other RCRA permitted facility and the process for disposal of cleanup waste-streams

Ecology response:

Thank you for your comment. The current format of the Permit Conditions for permit modifications of the Hanford Site-wide Permit does not include an introduction. The requested processes are described elsewhere in this document and/or the 207-SRB Closure Plan.

Comment # 65 from Russell Jim, Yakama Nation, dated June 23, 2016:

Conditions:

V.5.A: Edit to include Please include Attachment 9, Permit Matrix within Condition (or include unit specific requirements relative to Attachment 9) permit condition or somewhere within the Closure Plan.

It is impossible for the public to make an informed decision as to whether Ecology has all the conditions necessary to protect human health and the environment without reviewing Attachment 9. Furthermore, this attachment is not listed on the Ecology public comment website for review of this permit modification. The public should not have to search the Ecology website to find a document listed as a major component of a RCRA permit.

Ecology response:

Thank you for your comment. Attachment 9, in the Hanford Site-wide Permit, Revision 8c, is not being re-opened for public comment during this 207-A SRB Class 3 permit modification. Attachment 9 of the Hanford Site-wide Permit, Revision 8c, was made available for public comment from December 28, 2015 to February 13, 2016. The website version of Attachment 9 is intended to be the most up to date version.

<http://www.ecy.wa.gov/programs/nwp/permitting/hdwp/rev/8c/index.html>

Comment # 66 from Russell Jim, Yakama Nation, dated June 23, 2016:

Conditions V.5.B.3 thru 5 are rather straight forward, however, it is unclear how **Condition V.5.B.2** is even enforceable. There is no established schedule within the SAP or Addendum A to complete sampling or to submit a Data Analysis Report. How the permittee can possibly submit this report within 30 days of this permit modification? For what purpose is revised sampling required (it is not clear within this condition)? Furthermore Condition V.5.B.4 seems to conflict with what is required under Condition V.5.B.2. Has the final laboratory report already been completed? A Type of final laboratory analytical report is somewhat mentioned within the SAP. Addendum A-page A.6 lines 3-7 do vaguely discuss conclusions, etc. but nothing establishes a schedule or Data Analysis Report for Ecology review.

Ecology Response:

Thank you for your comment. As part of the preparations for evaluating clean closure, the Permittees must perform statistical evaluations of their grid sampling data. This permit condition was designed to ensure that the Permittees input the sampling analytical data back into the VSP to

determine if the null hypothesis was accepted or rejected, as the program requires. After receiving their final analytical data reports, the Permittees have 30 days to run this program in VSP and submit the unaltered report to Ecology. The report becomes part of their evaluation of clean closure data, and if the sampling met the clean closure standards. This step must occur before the Permittees can finish evaluating their data to determine if clean closure was achieved.

Comment # 67 from Russell Jim, Yakama Nation, dated June 23, 2016:

Edit Condition V.5.B.2 to clearly state the following points:

- The observational approach to cleanup and sampling will be followed unless Condition V.5.B.5 is deemed to apply. (Note: Additionally, edit the SAP and Addendum A to also reflect the *observational sampling* approach.)
- Ecology may require additional sampling and/or investigation after the Permittees implement the approved Sampling and Analysis Plan if Ecology determines that the sampling and analyses have not adequately demonstrated whether clean closure has been achieved. Such a requirement will be implemented pursuant to WAC 173-303-830(3). Additional sampling and analysis may be required for the following reasons;
- Specialized sample collection or analytical techniques are required to ensure adequate quantitation limits for chemical constituents; or
- Results indicate the need to analyze for additional constituents at certain locations; or
- Other reasons indicate the Sampling and Analysis Plan has not adequately demonstrated whether clean closure has been achieved.
- The Permittee will submit to Ecology a Data Analysis Report for review and determination as to whether additional sampling is required.

Ecology response:

Thank you for your comment. Grid (statistical) and focused (judgmental) sampling, as well as excavation of soils with exceedances, are addressed in the closure plan. The “Data Analysis Report” expectations are described in Permit Condition V.5.B.2, to ensure the Permittees follow the requirements for the use of the VSP in their closure plan.

Comment # 68 from Russell Jim, Yakama Nation, dated June 23, 2016:

Edit Permit Condition V.5.3 to clarify use of an AOC and applicable storage and sampling requirements per WAC 173-303-200. As written, it does not appear to be consistent with what is indicated within the Closure Plan. Additionally, sampling of an AOC must also confirm no exceedances of closure cleanup levels or additional closure action must be performed. Edit to reflect need for sampling of AOC. YN requests that there be no soils placed outside the cells but directly into ERDF containers. YN request that no bulk containers or 55 gallon drums be stored/staged adjacent to the basin.

Ecology response:

Thank you for your comment. Permit Condition V.5.B.3 requires additional soil sampling if a temporary loading stockpile is used. The closure plan describes the requirements for excavating soils, which demonstrate an exceedance of the cleanup levels.

Comment #69 from Russell Jim, Yakama Nation, dated June 23, 2016:

Edit Permit Conditions V.5.B.4 and V.5.B.5 to clearly reflect the following:

- The Permittees shall submit a contingent plan and post-Closure Plan for complying with WAC 173-303-610(8), 173-303-650(6) (c) (i) (A) and -650(6) (c) (i) (B) in the event that the removal and/or decontamination standards of WAC 173-303-650(6) (a) (i) cannot be achieved.

Ecology response:

Thank you for your comment. Permit Condition V.5.B.5 will be revised to include the contingent plan.

Comment # 70 from Russell Jim, Yakama Nation, dated June 23, 2016:

Condition V.5.B.6: Closure Performance Standards: The performance standards for soils based on the most stringent (lowest) of:

- Direct contact consistent with WAC 173-340-740(3)
- Soil concentrations to protect groundwater: derived using WAC 173-340-747(4) (with an exception of modified method B for hexavalent chromium using a Kd value of 0.).
- Protection of ecological receptors achieved through one of the following methods:
 1. Excavation of contaminated soil to a minimum of 15 feet below ground surface, or
 2. Excavation of contaminated soil such that residual soil concentrations do not exceed ecological screening levels listed in WAC 173-340-900 (Table 749-3), or
 3. A site-specific demonstration that remedial standards eliminate threats to ecological receptors.

Should there be changes in MTCA prior to closure, there will be no ‘back-sliding’ to less stringent cleanup levels.

Ecology response:

Thank you for your comment. Table 4 in Section 4.6.2.2 of the 207-A SRB Closure Plan was modified to include the more stringent MTCA Method B soil protective of groundwater cleanup levels for unrestricted land use. Other aspects of this comment are addressed in other responses in this document. Permit Condition V.5.B.1 requires that the 207-A SRB Closure Plan be followed. No changes are proposed to be made to the Permit Conditions.

Comment # 71 from Russell Jim, Yakama Nation, dated June 23, 2016:

Condition V.5.B.7: Deviations from TSD unit closure plan required by unforeseen circumstances encountered during closure activities shall be documented in the TSD unit-specific Operating Record, and Ecology shall be notified within seven (7) days. Ecology shall be notified of the necessity to change the closure plan in accordance with WAC 173-303-830. Ecology must approve the modification prior to instigation of any actions.

Ecology response:

Thank you for your comment. Closure plan modification is discussed in Section 4.7, and is incorporated into the Permit Conditions via Permit Condition V.5.B.1.

Comment # 72 from Russell Jim, Yakama Nation, dated June 23, 2016:

Condition V.5.B.8: Backfilling locations disturbed by excavation of contaminated soil will be re-contoured in a manner that would support establishment of native plant communities and promote the aesthetic integrity of the landscape.

Ecology response:

Thank you for your comment. WAC 173-303-610(2)(a)(iii), which “returns the land to the appearance and use of surrounding land areas to the degree possible given the nature of the previous dangerous waste activity” is cited in Section 4.3 of the Closure Plan, and incorporated into the Permit Conditions via Permit Condition V.5.B.1. No additional permit conditions are proposed. The 207-A SRB unit area is anticipated to remain consistent with the above referenced citation after backfilling until all cleanup actions are complete.

Comment # 73 from Russell Jim, Yakama Nation, dated June 23, 2016:

Edit to include new Permit Conditions for:

- Compliance with WAC 173-303-395 requirements as well as WAC 173-303-630 requirements with any on-site storage.
- Compliance to meet WAC 173-303-140 (LDRs). YN requests also request additional information regarding application of debris standards, etc within Introduction section and Closure Plan.

Ecology response:

Thank you for your comment. Container staging in less than 90 day temporary accumulation areas and transport to and management at ERDF is covered by the closure plan. Land disposal restrictions are not required if the unit group clean closes. LDRs at ERDF are incorporated as an ARAR in the action memorandum. Permit Condition V.5.B.5 requires the Permittees to submit a Post-Closure Plan if 207-A SRB cannot clean close. WAC 173-303-610(2)(a)(iii), which states “returns the land to the appearance and use of surrounding land areas to the degree possible given the nature of the previous dangerous waste activity” is also cited in Section 4.3 of the 207-A SRB Closure Plan. No additional permit conditions are proposed.

APPENDIX A: COPIES OF ALL PUBLIC NOTICES

Public notices for this comment period:

1. Public notice (focus sheet)
2. Classified advertisement in the *Tri-City Herald*
3. Notice sent to the Hanford-Info email list

Ecology Proposes Closure of 207-A South Retention Basins Storage Unit

The Washington Department of Ecology (Ecology) invites you to comment on a proposed change to the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion for the Treatment, Storage, and Disposal of Dangerous Waste, Revision 8c. The change is to close the 207-A South Retention Basins (SRB). This is the second of two public comment periods required by a Class 3 permit modification. The first comment period was held from June 30, 2015, through August 28, 2015.

The 207-A SRB are owned and operated by the U.S. Department of Energy (USDOE) and co-operated by CH2M HILL Plateau Remediation Company (the Permittees).

The Permittees submitted a closure package to Ecology in June 2015. As part of this package, the Permittees requested a Temporary Authorization (TA) to begin closure before the Class 3 permit modification was approved. Ecology approved the TA on July 24, 2015, with effective dates of July 27, 2015, through January 23, 2016. Ecology issued a 180-day extension to the TA on January 21, 2016, effective January 23 through July 22, 2016.

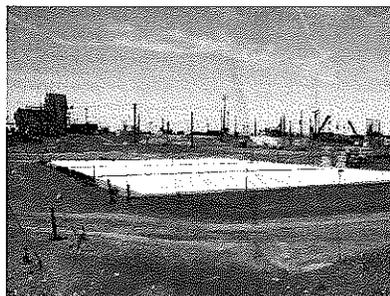
The modification adds the 207-A SRB Closure Plan to Part V of the permit. The Closure Plan will be included as Chapter 4 of Closing Unit Group 5, Part V.

207-A South Retention Basin Facts

The 207-A SRB are inactive surface impoundments (as defined in WAC 173-303-040). USDOE used the 207-A SRB to temporarily store, sample, and analyze 242-A Evaporator process condensate (mixed waste) before discharging it to the 216-A-37-1 Crib. The 207-A SRB first received waste from the 242-A Evaporator in March 1977. Discharge to the 207-A SRB ended in 1989.

The 207-A SRB are in the 200 East Area of the Hanford Site, directly east of the 242-A Evaporator.

The 207-A SRB consists of three concrete cells. Each cell has a 70,000-gallon design capacity. The floor dimension of each cell is 55 feet long, 10 feet wide at the bottom, and 7 feet deep.



The 207-A SRB, looking northwest with the 242-A Evaporator in the back left (photo courtesy USDOE).

Why It Matters

It is important that historical dangerous waste management units are permitted and closed.

Before we make our decision on this permit modification, we invite you to comment.

Public Comment Period

Permit Modification: 8c.2016.1D
May 9 to June 24, 2016

To Submit Comments

Please send comments by email (preferred), U.S. mail, or hand deliver them to:

Nina Menard
3100 Port of Benton Blvd.
Richland, WA 99354
Hanford@ecy.wa.gov

Public Hearing

A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, contact:

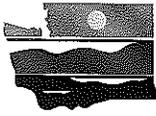
Ginger Wireman
509-372-7950
Hanford@ecy.wa.gov

Special Accommodations

To request ADA accommodation including materials in a format for the visually impaired, call the Nuclear Waste Program at 509-372-7950.

Persons with impaired hearing may call Washington Relay Service at 711.

Persons with speech disability may call TTY at 877-833-6341.



DEPARTMENT OF
ECOLOGY
State of Washington

3100 Port of Benton Blvd.
Richland, WA 99354

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OF ENTERPRISE SRVCS
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MAY 03 2016

DEPARTMENT OF ECOLOGY
NWP - RICHLAND

Public Comment Period

Revising Hanford's Dangerous
Waste Permit to close the 207-A
South Retention Basins.

Permit Modification: 8c.2016.1D

May 9 to June 24, 2016

VALERIE PEERY H0-57
ECOLOGY
3100 PORT OF BENTON BLVD
RICHLAND WA 99354-1670

124
124 1 1



Hanford's Information Repositories and Document Review Locations

Washington Department of Ecology
Nuclear Waste Program Resource Center
3100 Port of Benton Boulevard
Richland, WA 99354
Contact: Valarie Pardue 509-372-7950

Portland State University Library - LIBW
Government Information
1875 Southwest Park Avenue
Portland, OR 97201
Contact: Claudia Weston 503-725-4542

U.S. Department of Energy
Public Reading Room
Washington State University, CIC Room 101L
2770 Crimson Way
Richland, WA 99354
Contact: Janice Parthree 509-372-7443

Gonzaga University
Foley Center Library
502 East Boone Avenue
Spokane, WA 99258
Contact: John Spencer 509-313-6110

U.S. Department of Energy
Administrative Record and
Public Information Repository
2440 Stevens Center Place, Rm 1101
Richland, WA 99352
Contact: Heather Childers 509-376-2530

University of Washington Suzzallo Library
Government Publications
4000 15th Avenue Northeast
Seattle, WA 98195
Contact: Emily Keller 206-685-2660

Skilled Labor Trades

Welch's

MECHANIC
Boiler-Refrigeration Technician
Granview, WA

Welch's, a leader in the fruit juice industry, is seeking candidates for our Granview, WA processing facility in the following role:

Boiler Refrigeration Mechanic.
The successful candidate will have a minimum of 5 years experience in a manufacturing facility in maintenance and repair of boiler and ammonia refrigeration equipment. A strong electrical background and/or certification are preferred. Must be qualified to service electrical mechanical and pneumatic systems on food processing equipment. Candidates must be able to work multi-shifts in a bargaining unit position. Starting pay is \$23.91/hr plus shift differential. We offer excellent benefits and advancement opportunities. **SKILLS ASSESSMENTS & DRUG TESTING REQUIRED.** Welch's Attn: Human Resources Dept. Box 36, Granview, WA 98930.
mrose@welchs.com An equal opportunity employer.

Skilled Labor Trades

Pump and Pipe Tech

AgriNorthwest, a local agricultural operation, has an immediate opening for a full-time Pump & Pipe Tech to be located in Boardman, OR. Desired candidate will be able to repair and maintain water distribution system components to operate in a manner which will prevent and avoid erosion. This position requires the ability to fill and weld pipe of all sizes. Salary is commensurate with experience. Full-time employees receive excellent benefits including: Medical, Dental, Group Term Life, Disability, Retirement Plus Plan, 401k, Flex-Spending, and other miscellaneous value-added benefits. Qualified applicants who are interested need to send a resume to careers@agnorthwest.com or apply in person at AgriNorthwest 17496 S 26th St. in Boardman, OR 97008. Questions can call at (503) 734-5074. Ext. 6252/6253.

**Equal Opportunity Employer
Drug Free Workplace**

Skilled Labor Trades

BENTON
Substation Electrician

Benton PUD is accepting applications for a Journeyman Substation Electrician or Substation Electrician in Training. The primary purpose of the position is to construct, operate, maintain and repair substation equipment and devices. The position requires Journeyman Certification in Substation Craft or 2 years of Journeyman level electrician experience.

Applicants must apply online to be considered. For further position details, wage information, additional minimum requirements and to access our on-line application system, visit our "Job Openings" page on our Web Site at www.bentonpud.org. Opportunity closes on May 16, 2016.

**Equal Opportunity Employer:
Minorities/Women/
Veterans/Disabled**

Skilled Labor Trades

MCE
The Columbia Ironworks, Inc.

Welders-GTAW
Richland, WA. Fab shop, wage DOE

Required Skill & Experience
Multi-Trade Pipe Welding
Strict safety & quality
ASME and AWS specs
Intercept, drawings, weld symbols
Tight tolerances
Assembly of weld components
Operate welding equip, grinders, etc.

Weld test, Pass GG 2
carbon steel pipe test
Resume jill@columbiainc.com
or call 509-420-2416
for additional info

Going nowhere FAST?

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**Sell it fast!
Call 586-6181**

Tri-City Herald
Voice of the Mid-Columbia

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Auto Savers

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4 lines for 14 days

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Call 586-6181**

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Bargains

Free 3-line ad
for items priced
under \$200

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**Do-it-yourself
classified ads**

Save time and money. Go to www.tricityherald.com, click on Classifieds and follow the user-friendly steps to place your ad.

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- Print and Online Options
- Basic/Deluxe/Premium Packages

Tri-City Herald
tricityherald.com
VOICE OF THE MID-COLUMBIA

Harford Dangerous Waste Permit

The Washington State Department of Ecology (Ecology) invites you to comment on a proposed change to Revision 8c of the Site/Waste Permit to close the 207-A South Retention Basin (SRB) in the 200 East Area of the Harford Site.

The public comment period extends from May 9, 2016 through June 24, 2016.

Why it Matters
The 207-A SRB are surface impoundments. The United States Department of Energy (USDOE) used the 207-A SRB to temporarily store, sample, and analyze 242-A evaporator process condensate (mud water) before discharging it to the 216A-37-1 Cell. The 207-A SRB received waste from the 242-A Evaporator in March 1977. Discharge to the 207-A SRB ended in 1982 and it no longer receives or stores waste. USDOE submitted a closure package in June 2015. As part of this package, USDOE requested a Temporary authorization (TA) request to begin closure before the Class 3 permit modification was approved. Ecology approved the TA on July 24, 2015 with effective dates of July 27, 2015 through January 23, 2016. A 180 day extension to the TA was issued by Ecology on January 21, 2016. The TA extension expires July 21, 2016.

The Permittees are:

United States Department of Energy
Richland Operations Office
PO Box 550
Richland, Washington 99352

CH2M Hill Plateau
Remediation Company
PO Box 16000 RT 30
Richland, Washington 99352

To review the proposed modification in detail beginning May 9, 2016, visit the Washington State Department of Ecology website at <http://www.ecy.wa.gov/programs/rwp/contact.htm>.

You may also review the proposed modification at one of the Harford Public Information Requestors:

Washington State Department of Ecology
Nuclear Waste Program Resource Center
3300 Port of Benton Boulevard
Richland, Washington 99354
Contact: Valarie Farnue 509-372-7950

United States Department of Energy
Administrative Record and Public Information Repository
2440 Stevens Center Place, Room 1101
Richland, Washington 99352
Contact: Heather Chikara 509-376-2630

United States Department of Energy
Public Reading Room
Washington State University, Tri-Cities
Consolidated Information Center (CIC),
Rm. 101L
2770 Cimarron Way
Richland, Washington 99354
Contact: Janice Partridge 509-372-7443

University of Washington Suzzallo Library
Government Publications
4000 15th Avenue NE, 5th Floor
Seattle, Washington 98195-2900
Contact: Emily Keller 206-685-2660

Portland State University Library - LRW
Government Information
1875 Southwest Park Avenue
Portland, Oregon 97201
Contact: Claudia Weston 503-725-4542

Conaga University
Foley Center Library
502 East Boone Avenue
Spokane, Washington 99258
Contact: John Spitzer 509 313-6110

Your opinions and concerns are important to the Washington State Department of Ecology. For more information on the public comment period, please contact Ginger Wiseman at Ginger.Wiseman@ecy.wa.gov or 509-372-9150.
#2431612 05/08/2016

CITY OF RICHLAND, WASHINGTON
CALL FOR BIDS

and Title 49, Code of Federal Regulations, Department of Transportation, subtitle 49.103 of the Secretary, Part 21, nondiscrimination in federally assisted programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, its advanced business enterprises as defined in 49 CFR Part 26 will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, national origin, or sex in consideration for an award.

#2429915 05/08/05/08/2016

PORT OF KENNEWICK AND CITY OF KENNEWICK

**Columbia Gardens Urban Wine & Artisan Village
Groundbreaking Event**

PUBLIC NOTICE IS HEREBY GIVEN that the Port of Kennewick and City of Kennewick will hold a groundbreaking event to celebrate the start of construction of the Columbia Gardens Urban Wine & Artisan Village on Morcay May 9, 2016 at 11:00 am. The location of the future wine village, 421 E. Columbia Drive on the Columbia River Interim Island, located near the Cable Bridge and directly across the street from ZIP 5, is historic downtown Kennewick, Washington.

The public is welcome and encouraged to attend. For more information, please contact Paul H. Kennewick at (509) 586-1186.
#2429915 05/06/05/08/2016

**INVITATION FOR BID
PORT OF BENTON, RICHLAND AIRPORT
CIRCLE AREA HANGAR TAXILAINE PROJECT**

Sealed proposals will be received for the Circle Area Hangar Taxilaine project, addressed to the Port of Benton, Richland Airport, 3250 Port of Benton Blvd., Richland WA 99354 until 11:30 am local time on June 1, 2016 and will be publicly opened and bids received after the time fixed for the opening will not be considered.

A pre-bid meeting with optional tour of project site will be held at the Port of Benton, 3250 Port of Benton Blvd., Richland WA 99354, at 10:00 am, local time May 24, 2016 for those interested contractors, subcontractors, and suppliers. Interested contractors are encouraged to attend.

The project consists of, but is not limited to: rehabilitation and repair of various air field pavement areas at the Richland Airport, Richland, WA. Work will include pavement marking removal, crack seal, seal coating, filter catchment, pavement repair, application of pavement markings on sealed airport pavements and related work. Pavements to be rehabilitated include Runways 1-19 and 2-24; Taxiways A, B, C and East Hangar Taxiways Aprons; TBO and Circle Area Aprons. Local Plan Centers have been notified and will have specifications, including bid forms and contract documents, available for examination.

Copies may be obtained at the office of JUB ENGINEERS, Inc., located at 2810 W. Clearwater Ave., Ste. 201, Kennewick, WA 99336, for a total payment of \$50.00 for each set, which is non-refundable. Plans and Specifications will also be available at the JUB FTP site. To access JUB's FTP site, navigate to the following URL: ftp.jub.com

User: Richland
Pass: Airport (case sensitive)

Each bid must be accompanied by a certified check, cash, cashier's check, or money order for not less than 5% of the total bid.

CIVIL RIGHTS - TITLE VI
The Port of Benton in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. § 20006) and Title VI of the Federal Aviation Act of 1958 (70 Stat. 594, 49 U.S.C. § 1415) hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, its advanced business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.

The Port of Benton is also and/or subject to the following Federal and/or Affirmative Action:

- Governmentwide Decantment and Subcontracting
- Governmentwide Requirements for Drug-Free Workplace
- Foreign Trade Restrictions
- Buy American Preference
- Disadvantaged Business Enterprise

The Port of Benton is an equal opportunity and affirmative action employer. The re-

quire in the award or performance of this contract. The Owner encourages participation by all firms qualifying under the application for minority business size or ownership.

All required Federal clauses including the labor provisions, and wage rates are included in the specifications and bid documents. Each bidder must supply all of the information required by the bid documents and specifications.

This project includes Federal funds and is subject to the wage provisions of the Washington State Public Works Laws, Federal Davis-Bacon, and related acts. Payments to the Contractor will not be made unless intent to Pay Prevailing Wages have been filed and approved for the Prime Contractor and all subcontractors. Each bidder shall furnish the Statement of Bidders Pre-Qualifications to the OWN ER with satisfactory evidence of his compliance to perform the work contemplated of the award of this contract.

The Port of Benton reserves the right to reject any and all proposals, waive any informatics, or irregularities, postpone the award of the Contract for a period not to exceed One Hundred Twenty (120) days, and accept the proposal that is in the best interest of the Port of Benton. The award of the Bid is contingent upon the approval of Federal funding.

#2437409 05/08/05/15/2016

**INVITATION FOR BID
REHABILITATION PROJECT
PORT OF BENTON - RICHLAND AIRPORT**

Sealed proposals will be received for the Rehabilitation project, addressed to the Port of Benton, Richland Airport, 3250 Port of Benton Blvd., Richland WA 99354 until 11:00 am local time on June 1, 2016, and will be publicly opened and bids received after the time fixed for the opening will not be considered.

A pre-bid meeting with optional tour of project site will be held at the Port of Benton, 3250 Port of Benton Blvd., Richland WA 99354, at 8:00 am, local time May 24, 2016 for those interested contractors, subcontractors, and suppliers. Interested contractors are encouraged to attend.

The project consists of, but is not limited to: rehabilitation and repair of various air field pavement areas at the Richland Airport, Richland, WA. Work will include pavement marking removal, crack seal, seal coating, filter catchment, pavement repair, application of pavement markings on sealed airport pavements and related work. Pavements to be rehabilitated include Runways 1-19 and 2-24; Taxiways A, B, C and East Hangar Taxiways Aprons; TBO and Circle Area Aprons. Local Plan Centers have been notified and will have specifications, including bid forms and contract documents, available for examination.

Copies may be obtained at the office of JUB ENGINEERS, Inc., located at 2810 W. Clearwater Ave., Ste. 201, Kennewick, WA 99336, for a total payment of \$50.00 for each set, which is non-refundable. Plans and Specifications will also be available at the JUB FTP site. To access JUB's FTP site, navigate to the following URL: ftp.jub.com

User: Richland
Pass: Airport (case sensitive)

Each bid must be accompanied by a certified check, cash, cashier's check, or money order for not less than 5% of the total bid.

CIVIL RIGHTS - TITLE VI
The Port of Benton in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. § 20006) and Title VI of the Federal Aviation Act of 1958 (70 Stat. 594, 49 U.S.C. § 1415) hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, its advanced business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.

The Port of Benton is also and/or subject to the following Federal and/or Affirmative Action:

- Governmentwide Decantment and Subcontracting
- Governmentwide Requirements for Drug-Free Workplace
- Foreign Trade Restrictions
- Buy American Preference
- Disadvantaged Business Enterprise

The Port of Benton is an equal opportunity and affirmative action employer. The re-

quire in the award or performance of this contract. The Owner encourages participation by all firms qualifying under the application for minority business size or ownership.

All required Federal clauses including the labor provisions, and wage rates are included in the specifications and bid documents. Each bidder must supply all of the information required by the bid documents and specifications.

This project includes Federal funds and is subject to the wage provisions of the Washington State Public Works Laws, Federal Davis-Bacon, and related acts. Payments to the Contractor will not be made unless intent to Pay Prevailing Wages have been filed and approved for the Prime Contractor and all subcontractors. Each bidder shall furnish the Statement of Bidders Pre-Qualifications to the OWN ER with satisfactory evidence of his compliance to perform the work contemplated of the award of this contract.

The Port of Benton reserves the right to reject any and all proposals, waive any informatics, or irregularities, postpone the award of the Contract for a period not to exceed One Hundred Twenty (120) days, and accept the proposal that is in the best interest of the Port of Benton. The award of the Bid is contingent upon the approval of Federal funding.

#2437302 5/8 & 6/1/2016

MEETING NOTICE

Tuesday May 10, Benton Irrigation District is having a Board of Directors meeting at 3:00PM at the Benton Irrigation District office at 47500 Highland Rd. The meeting is open to the public at 5:00 PM on 05/09/2016

#2437349 05/08/05/09/2016

MEETING NOTICE

Monday May 23, The Benton Irrigation District is having a Board of Directors meeting at 3:00PM at the Benton Irrigation District office at 47500 Highland Rd. The meeting is open to the public at 5:00 PM on 05/09/2016

#2437384 05/08/05/09/2016

ORDINANCE NO 20-16

ORDINANCE NO. 20-16 AN ORDINANCE of the City of Richland amending Richland Municipal Code Title 23: Zoning Regulations, amending other standards by adding the C-2 Neighborhood Retail zone and single family residential zones Ordinance effective the day following its publication. Ordinance available at the City Clerk's Office, 375 George Washington Way, Richland, WA 99352
#2433913 05/08/2016

ORDINANCE NO 21-16

ORDINANCE NO. 21-16 AN ORDINANCE of the City of Richland relating to land use, zoning, classifications and districts by amending Title 23: Zoning Regulations, amending other standards by adding the C-2 Neighborhood Retail zone and single family residential zones Ordinance effective the day following its publication. Ordinance available at the City Clerk's Office, 375 George Washington Way, Richland, WA 99352 or (509) 586-1186
#2433947 05/08/2016

Request for proposal for wand and internet connectivity

Purpose
Mid-Columbia Libraries is accepting competitive proposals for a contract to purchase ISON PRN or comparable services at 1320 W Hopkins, Pasco, WA 99301.

Full details can be found at <http://www.midcolumbialibraries.org/rfp/PRN2016>

4:00 PM to the following address: proposals received after January 23, 2015 4:00PM will not be accepted. Vendors must submit one original with signatures, two copies, and one electronic version of the RFP to the following address:

Jon Stuekel, IT Director
Mid-Columbia Libraries
405 S Dayton St
Kennewick, WA 99336
jstuekel@midcolumbia-libraries.org

Pre-Submission Questions
Questions may be submitted to Mid-Columbia Libraries by Dec 23, 2014 via mail or email:
Mid-Columbia Libraries
The Summit Questions
Attn: Jon Stuekel, IT Director
405 S. Dayton St., Kennewick, WA 99336
itask@midcolumbia-libraries.org
#2429922 05/08/2016

Franklin County is soliciting proposals for Benefits Plan Consultant service.

Request for Proposal specifications can be obtained from: Franklin County Human Resources, 1016 North 4th Avenue, Pasco, WA 99301.
(509) 546-5813 or www.franklin.wa.us/rfp/

All proposals must be in a sealed envelope and clearly marked "RFP Franklin County Benefits Plan Consultant". No faxed, emailed, or telephone proposals will be accepted. All proposals shall be received by 3:00 p.m. (PST) on May 20, 2016.

Proposals should be prepared in a simple straightforward manner with concise description of capabilities to satisfy the requirements of the request. Emphasis should be on completeness and clarity of content.

#2418117 04/29/04/30/05/01/05/06/05/07/05/08/2016

NOTICE OF PUBLIC HEARING

PLEASE TAKE NOTICE that Adriana Robledo has filed a petition (NW-SP 2016 000) requesting a special permit to locate an auto sales lot in a C-1 zoning district.

Legal: Lots 25-30, Block 13
Gentry Addition
General Location: 609 W Lewis St., Pasco, WA 99301

THEREFORE, LET ALL CONCERNED TAKE NOTICE that a Public Hearing will be held by the Planning Commission of the City of Pasco, Washington, in the City Council Chambers, Pasco City Hall, 525 North 3rd Avenue at the hour of 7:00 p.m., Thursday, May 19, 2016, so that all concerned may appear and present any objections or support for the proposed special permit.

State law permits "only one open" public hearing on this matter. This will be the only opportunity to provide input on this issue. For additional information, please contact the Pasco City Planner at **ADVERTISING FOR BID**

Pasco School District #1
2016 Interior Painting Projects
Pasco, WA

The Pasco School District #1 will receive sealed bids for their 2016 Interior Painting Projects from qualified general contractors.

Bids will be received until 10:00 am (PST) on Wednesday, May 25, 2016 at Pasco School District Administrative offices located at 1215 W. Lewis Street, Pasco, WA 99303. Bids received after the stated time will not be accepted. The bids will be publicly opened by the Owner's staff. Official bid openings shall be made public within 24 hours of bidding. Bids will be on a first-come, first-served basis to the lowest responsible bidder. The Owner reserves the right to accept any bid or to waive irregularities in the bid opening. No bids shall be returned for a period of 30 days subsequent to opening of bids without the written consent of the Owner.

There will be a mandatory, pre-bid walk through for all bidding general contractors on Wednesday, May 11th 2016 at 2:30 pm starting at Livingston Elementary School located at 2515 Road 84, Pasco, WA 99301. Subcontractors are also welcome.

The Project multiple base bid scope consists of painting the entire interior of Edwin Markham, Livingston and McGee Elementary Schools. The interior wall surfaces of classrooms, offices, multi-purpose room, gymnasium, music room, library, lobbies, and corridors shall be repainted. The work includes preparation of surfaces, caulking, mudding, and painting concrete, CMU, brick, wood trim, hollow metal doors & frames, window frames and miscellaneous exposed woodwork and piping. There is an additive at

(509) 545-3441

David L. McDonald
Planning Commission Secretary
Pasco, Washington
#2434064 05/08/05/15/2016

The U.S. Department of Energy and Environmental Protection Agency, and the Washington State Department of Ecology concurs, in siting one waste site and proposing a modified technology approach for another waste site at the Harford 300 Area Record of Decision (ROD). These changes are documented in an Expanded Area Final Action ROD. The changes are available at <http://pdx.lanl.gov/rfp/mca/efw/viewDoc?docId=30000071738>

The 300 Area of the Harford Site performed full characterization and research using a number of associated facilities and waste sites. Remediation of the 300 Area is currently being conducted under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) in accordance with the Harford 300 Area ROD for 300-F1-2 and 300-F5, and ROD for 300-F1-1 (EPA 2013), referred to as the 300 Area Final Action ROD. The changes documented in the ESO are:

1. The 600-403 waste site is a newly discovered site; the description and official title of waste site 600-403 is "Thorium Contamination near 618-13." The 600-403 waste site is being added to the 300 Area Final Action ROD for removal, treat, and dispose (RTD) remedial activity to meet residential cleanup levels pursuant to the CERCLA (117) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR 300.435)(2)(ii), and 300.825(a)(2). The nature of the waste type (assayed radiological contamination) fits within a 300 Area Final Action ROD remedy.

2. Waste site 300-288-2, "Uncontaminated Disposal Site within Green Hill Site," is a subsection of the 300 288 already listed in Table 1 of the 300 Area Final ROD. Section 12.2.1 of the 300 Area Final Action ROD, "RTD at Waste Sites for 300-F5-2," requires all sites undergoing RTD to be backfilled or revegetated. The 300-288-2 waste site is located within Harford Borrow Pit # 6. A. The conclusion of remediation 300-288-2 to revegetate this site. This portion of the waste site will not be backfilled or revegetated, as it will continue to be used for borrow material. As borrow materials are excavated, and pit 6 is closed, recontouring and revegetation will be complete per an EPA approved Remedial Design Report/Remedial Action Work Plan. The one state of 300-288-2 is consistent with the residential cleanup levels and decision of the 300-F1-2 Final Action ROD.

For more information, call Judy Douglas at (509) 376-5494.
#2429974 05/08/2016

Pardue, Valarie L. (ECY)

From: Twomey, Rochelle (ECY) <rtwo461@ECY.WA.GOV>
Sent: Monday, April 11, 2016 11:21 AM
To: HANFORD-INFO@LISTSERV.WA.GOV
Subject: Notice of upcoming comment period on Closure of the 207-A South Retention Basin.

This is a message from the Washington Department of Ecology.

Ecology plans to start a 45-day public comment period on a proposed modification to the Hanford Site-wide Permit for the Closure of the 207-A South Retention Basin. The comment period is scheduled for May 9 to June 24, 2016.

The U.S. Department of Energy and CH2M HILL Plateau Remediation Co. (the permittees) have submitted the draft Closure Plan and associated supplemental documentation to Ecology for inclusion in Part V of the *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Revision 8c*.

More information will be available on Ecology's website, the Hanford Public Information Repositories, and other document review locations when the public comment period starts.

Question or comments? Email Hanford@ecy.wa.gov or call 800-321-2008.



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APPENDIX B: COPIES OF ALL WRITTEN COMMENTS

Mullin, Tim (ECY)

From: Bohrmann, Dieter (ECY)
Sent: Sunday, January 10, 2016 11:08 PM
To: Mullin, Tim (ECY)
Subject: Fwd: Comment on Closure of 207-A

FYI ...

Sent from my iPhone

Begin forwarded message:

Resent-From: <hanford@ecy.wa.gov>
From: Mike <mikeconlan@hotmail.com>
Date: January 10, 2016 at 6:56:03 PM PST
To: "Hanford (ECY)" <hanford@ECY.WA.GOV>
Subject: **Comment on Closure of 207-A**

Dieter Bohrmann:

- 1) Remove all nuclear waste,
- 2) Do not allow anymore nuclear waste into the facility,
- 3) Replace all the single storage tanks,
- 4) Stop all the nuclear leakage entering the Columbia River.

Mike Conlan

Redmond WA



Confederated Tribes and Bands
of the Yakama Nation ERWM

Established by the
Treaty of June 9, 1855

June 23, 2016

Nina Menard
Washington State Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99354
E-mail addresses: hanford@ecy.wa.gov
nmen461@ecy.wa.gov

Subject: Review of the proposed Closure Plan 207-A South Retention Basin (S-2-7), Closure Group 5 Conditions 207-A South Retention Basins, and Factsheet.

Dear Ms. Menard:

The Confederated Tribes and Bands of the Yakama Nation is a federally recognized sovereign pursuant of the Treaty of June 9, 1855 made with the United States of America (12 Stat. 951). The U.S. Department of Energy Hanford site was developed on land ceded by the Yakama Nation under the 1855 Treaty with the United States. The Yakama Nation retains reserved rights to this land under the Treaty. YN's position regarding the ultimate closure of all Hanford Site waste facilities is cleanup actions (with confirmatory sampling and analysis of surface and subsurface soils) to demonstrate attainment of cleanup levels protective of YN Tribal member health and welfare.

We thank you for addressing several of our earlier comments on the draft closure plan within the Responsiveness Summary. However, we note similar issues of concern as identified in previous submittals of Hanford site closure plans (e.g. CWC-WRAP, T-Plant, and Trenches 31 & 34). More specifically, the lack of a unit-specific QA/QC plan to ensure that all information, data, and resulting decisions are technically sound, statistically valid, and properly documented which includes data verification criteria such that it can be determined whether each individual data element is acceptable for its intended decision-making purpose, the seemingly long storage of wastes prior to disposal, unknown disposal facilities and specific treatments for wastes streams, and not least, land-use determinations which do not support full subsistence uses of our YN Treaty Rights. Within the draft Permit, we find the lack of conditions for use of the observational approach to sampling, performance standards, or potential LDRs disturbing as these are poorly or not at all detailed within the Closure Plan.

We look forward to discussing our vision of cleanup and all our concerns with you further.

Sincerely,

Russell Jim
Yakama Nation ERWM Program Manager

cc:
Alex Smith, Washington State Department of Ecology
Stacy Charbonneau, Manager, US Department of Energy

Dennis Faulk, US Environmental Protection Agency
Ken Niles, Oregon Department of Energy
Administrative Record

Attachment #1:

YN ERWM PROGRAM (YN) comments (and requests) on the Class 3 Modification to the Hanford site RCRA Permit for Closure of the 207-A South Retention Basin Closure Plan

General:

- Providing the SEPA checklist for public review promotes better understanding of the SEPA process and enhances public knowledge of the unit. Please provide link to submitted SEPA checklists for all future permit modifications.
- YN has previously provided our objection to the use of the Comprehensive Land-Use Plan (CLUP) and its provisions. It does not recognize YN Treaty Rights. All assessments and cleanup alternatives should be protective of, and based upon, anticipated Tribal subsistence uses.
- Factsheet should more clearly explain the temporary authorization process and provide a link to the document or ensure its availability on the Administrative Record.
- Factsheet should also include the full text of WAC 173-303-830(4)(c)(ii)(F) which states the permittee's compliance history during the life of the permit being modified is available from the Department of Ecology contact person. Knowing the history of non-compliance can be helpful to understanding whether or not the permittee can demonstrate responsible decision-making. Ecology's summary to comment response "comment is noted" seems rather short. There is no explanation as to why a simple request to assist public understanding of permittee actions is being denied.
- YN does appreciate the inclusion of hyperlinks where feasible.

Chapter 4.: YN does appreciate the over-all inclusion of additional design, process details, and site information.

- Section 4.1:
 - In lines 4-5, please to add to end of sentence the following: *and contains compliance requirements necessary for conducting closure enforceable under the RCRA Permit.*
 - YN understands the Ecology is responsible for ensure proper corrective actions requirements for the entire Hanford Site and requests inclusion of the following text to line 28: *It is anticipated remedial actions for radioactive constituents shall be consistent with the closure activities required under WAC 173-303.*
- Section 4.1.1:
 - Please provide figure H-2-90783. It is referenced in both the Closure Plan and in the Responsiveness Summary. It is the basis of much information and is not readily available on the Administrative Record. There is no way to verify if design is per details without it (e.g., the liner and concrete were integrated to avoid preferential pathways to the soil column).
 - Clarification is requested beyond Ecology responsiveness comment (i.e. the TPA change request C-07-02 is out of scope for this closure plan) as to why this information was not included on the timeline-Figure 1.
- Section 4.1.3: Clarify that listed waste codes will remain and appropriate treatments.
- Section 4.3:
 - Edit to include the following: *Should there be changes in MTCA prior to closure, there will be no 'back-sliding' to less stringent cleanup levels.* YN requests Ecology ensure enough flexibility within the closure permitting process to allow Ecology to retain its authority to set cleanup levels at more stringent levels and request additional characterization/cleanup to achieve these levels.
 - YN requests the following closure performance standards be identified within the Closure Plan and the Permit:
 - Direct contact consistent with WAC 173-340-740(3)
 - Soil concentrations to protect groundwater: derived using WAC 173-340-747(4) (with an exception of modified method B for hexavalent chromium using a Kd value of 0.)
 - Protection of ecological receptors achieved through one of the following methods:

1. Excavation of contaminated soil to a minimum of 15 feet below ground surface, or
 2. Excavation of contaminated soil such that residual soil concentrations do not exceed ecological screening levels listed in WAC 173-340-900 (Table 749-3), or
 3. A site-specific demonstration that remedial standards eliminate threats to ecological receptors.
- Edit line 33 to read: *As required by the Washington State Dangerous Waste Regulations and the TPA Action Plan...affect soil.* Ecology's permitting authority lies with the Dangerous Waste Regulations of WAC 173-303, not the TPA Action Plan.
 - YN reiterates its disagreement with use of the CLUP to determine land-use and/or cleanup standards. YN requests deletion of lines 13-18, page 4.14.
 - Section 4.4.2:
 - Edit line 17 to delete following text: " and up to 1 m (3ft) of soil beneath the structure, which will meet the requirements of WAC 173-303-610(2)(b)(ii)." There is no guarantee that removal of only 3 ft of soil will suffice to meet clean closure requirements. Clarify the *observational approach* to sampling will be applied and soil removal will continue until cleanup standards are met or it has been demonstrated that all soil cannot be practicably removed or decontaminated.
 - Edit line 21: to read: *...unrestricted land use standards. Should there be changes in MTCA prior to closure, there will be no 'back-sliding' to less stringent cleanup levels.*
 - YN notes that Table 4 contains only direct contact values. Edit Table 4 to include ecological protection values. YN also notes increase in closure performance standard for p-cresol from 4000 to 8000 and request use of lower value.
 - Edit Table 4 to remove asterisk from analytes carbon tetrachloride and
 - chloroform. This closure plan does not demonstrate removal of the Hypalon liner can be done intact and that there was no degradation of the liner.
 - This section seems to address only soil sampling, however the regulations require description of the steps needed to remove structures and confirmation of compliance with clean closure standards (WAC 173-303-640). Edit to clarify there will be visual inspection prior to commencement of closure activities. And that all visible staining (on the concrete) will be noted and samples taken at these locations.

The presence of visible staining can be used as the basis for additional judgmental samples. The absence of visible staining cannot in general be used as the sole basis for concluding that contamination is absent.

- Edit lines 31 to clarify that permit modification will be submitted in accordance with WAC 173-303-830.
- Edit lines 27-28 to clarify: what is meant by "where cracks in the elastomeric coating warrant sampling."
- Section 4.5: Section 4.5.1:
- Clarify the regulatory pathway for disposal of RCRA wastes at ERDF. Clarify this in other sections as indicated. Identify the disposal facility such that proper waste characterization according to the waste acceptance criteria of the receiving facility may be met.
- Reader cannot locate Sections 5.2 & 6 within Chapter 4. Clarify.
- Section 4.5.1.2-4.5.1.4 and Section 4.5.2- 4.5.2.3.4:
- Edit to provide additional detail descriptions regarding all waste management and disposal activities to clarify compliance with WAC 173-303-170 thru WAC 173-303-230 requirements. It is unclear how these regulations are being met (In general: Sections 4.5.2.1.2 & 4.5.2.3.2 are duplicative and incomplete. See comments below and provide more details.
- Identify compliance requirements per WAC 173-303 within each waste management sections. Edit to include: How the nature and extent of contamination will be evaluated; potential types of

- equipment; detail of equipment decontamination; how additional sampling efforts will be conducted; details to demonstrate compliance with the regulations stated.
- Edit (and throughout Closure Plan as needed) to include container management regulations and details of how compliance with these requirements are met. In Section 4.5.2.3.4, provide details as to training, etc of 'a waste specialist.'
 - Clarify what is meant by "miscellaneous solid waste will be managed as appropriate for the nonradiological and radiological contaminants present or suspected to be present."
 - Clarify (provide more detail) what is meant by "wastes generated through implementation of this closure plan will be characterized in accordance with the waste acceptance criteria of the receiving facility."
 - Clarify which information regarding newly generated wastes, etc will be recorded in the Hanford Site Waste Information Tracking system, and recorded unit-specific facility operating record.
 - Clarify that the IQRPE's report will be retained in the unit specific operating record and the Administrative Record.
 - Delete any text which states or implies that the waste will be treated as need to meet LDRs." Throughout the document, it is unclear as to how the LDRs are to be met and which debris standards are applicable. Provide details as to the disposal facility, where and how treatment for LDRs will be performed and storage locations prior to disposal. Identify anticipated waste treatments types (e.g. Section 4.5.2.3.6).
 - Clarify statement regarding storage of dangerous wastes (e.g., Sections 4.5.2.1.2 & 4.5.2.3) at Hanford TSD units permitted to operate as container storage areas or a less than 90-day storage area prior to disposal. The scheduled closure of a RCRA TSD includes its waste disposal. Disposal must be within the 180 days unless an extension is granted. Clarify if there is any intent or possibility that closure activities include waste storage at a RCRA container storage area beyond 180 days. Furthermore, LDR storage provisions state allowance of storage for only the time necessary for treatment.
 - Clarify if 'roll-off containers' will be reused and process for their decontamination.
 - Clarify how the waste profile maybe adjusted. Any new waste codes cannot be assigned without a modification to the Part A form.
 - Clarify specific treatments to be used for each anticipated form of demolition wastes. Provide details as to how and where treatment activities will be conducted.
 - Clarify maximum wind speeds for application of dust fixatives.
 - Section 4.5.16: Delete all text, which states only 3ft of soils will be removed and demolition is considered complete, and rewrite to state the *observational approach* will be followed. See previous comment.
 - Section 4.5.2.3.7: Edit recordkeeping to clarify compliance with WAC 173-303-380 requirement and include that these records will be placed in the Administrative Record for the unit. Include statement that sampling logbooks and sampling data and training records will also be retained in the unit's Administrative Record.
 - Section 4.5.4: Include training matrix tables for personnel. Include the minimum training requirements for all samplers.
 - Sections 4.6-4.6.2.8:
Develop a unit-specific QA/QC plan to ensure that all information, data, and resulting decisions are technically sound, statistically valid, and properly documented which includes data verification criteria such that it can be determined whether each individual data element is acceptable for its intended decision-making purpose. Ensure the QA/QC plan contains a Data Quality Assurance Plan. Ensure its consistency with Ecology Publication #09-05-007 [Guidance for Preparing Waste Sampling and Analysis Documents and QA/QC Requirements at Nuclear Waste Sites.

The closure plan must establish specific data acceptance criteria that ensure that data meeting the criteria will result in closure decisions within an acceptable degree of uncertainty. Data that do not meet the acceptance criteria must be rejected, even if the Ecology notification and discussion takes place as described. The quality assurance project plan should also address the circumstance when the quantity of acceptable data fails to meet the completeness criterion established as part of the data acceptance tests, and what corrective action is to be taken when the completeness criterion is not met.

The specific methods, agreements, and procedures to be used must be documented or referenced in the closure plan. Otherwise, Ecology has no basis to evaluate whether or not data from sampling conducted "consistent with laboratory agreements, laboratory analytical procedures, and HASQUARD" are adequate or appropriate to the specific decisions to be made under this closure plan.

In the SAP:

- Edit to include text to clarify the required documentation of the specific procedures and equipment that will be used for the proposed treatment, including any sampling and analysis requirements that may be used to verify successful required treatment of LDR wastes. Clarify that all data-not just the listed analytes-will be entered into HEIS.
 - Clarify the following are included (edit as necessary) as information to be retained:
 - Confirmation records.
 - Waste information (e.g. manifest numbers).
 - Waste sampling records and associated documentation.
 - Laboratory records and associated documentation.
 - Documentation regarding waste re-evaluation frequencies.
 - Special waste analysis requirement documentation.
- Edit to include immediate (or within 7 days) notification to Ecology of corrective actions applied to field activities.
- Clarify if the following are evaluated: The parameters for which each environmental media sample will be analyzed and the rationale for selecting these parameters and the frequency with which analysis of a waste will be reviewed, or repeated, to ensure that the analysis is accurate and current. [WAC 173-303-300(5)(a)]
- Clarify if the following are evaluated: Procedures for how non-detects, and any tentatively identified compounds which may be reported with laboratory analytical results will be assessed and/or used for decision-making purposes, and to identify any contaminants in addition to those already identified for which establishment of closure performance standards may be warranted. [WAC 173-303-300(5)(a)]
- Methods of obtaining representative samples of soils for all sampling and analysis, which may be, required pursuant to WAC 173-303-110 requirements and consistent with the requirements specified in WAC 173-340-810 and WAC 173-340-820. [WAC 173-303-300(5)(c)]
- Clarify why closure actions do not include scabbling of all discolored or staining areas identified on the concrete structure.
- Clarify that judgmental sampling is equivalent to focus sampling for those areas of concern identified during the visual inspection.
- Clarify which field changes made during sampling are considered unexpected events and how they are to be dealt with.
- Clarify what are "established sampling practices," etc as discussed in Section 4.6.2.1.
- Clarify what is meant by "all wastes (including unexpected wastes) generated by sampling activities will be managed in accordance with applicable regulations "(Section 4.6.2.1).
- Clarify in Section 4.6.2.1 that subsurface sampling is not deemed necessary *at this point in time*.

- Clarify the process for removal of soils surrounding the 'node location.' Confirm that the observational approach will be applied to the vertical and lateral extent of contamination above clean closure levels.
- Clarify and ensure that concept regarding "document version control" is through the permit modification process, not a non-specific administrative document control process.
- Clarify what is meant by "sampling will be performed in accordance with established sampling practices."
- Clarify that should a target analyte be detected at or above clean closure levels but less than the PQL or the analytical method, the lab will be asked to evaluate and lower the PQL.
- Provide references to generalized internal work requirements and processes.
- Identify the percentage of data to be validated.
- Edit Table 5 schedule to provide the time required for intervening closure activities.
- Section 4.9:
 - More details are needed for clarification that the information will be documented in the Hanford Facility Operating Records and maintained until final closure of the facility including completion of any required post closure care or corrective action
 - Include results of data reviews as a part of the minimum information to be placed in the Administrative record to support closure certification and Ecology determinations.
 - Edit to clarify there is no anticipated future use of the 207-A SBR Area.

Attachment #2:

YN requests review and inclusion of the following text in the development of a QA/QC Plan:

A quality assurance/quality control (QA/QC) plan, or equivalent, to document all monitoring procedures to ensure that all information, data, and resulting decisions are technically sound, statistically valid, and properly documented. Each QA/QC plan shall include, or contain a reference to another document, which will be used and includes, the elements as defined.

Each QA/QC plan shall contain a Data Quality Assurance Plan that includes the following:

- Data Collection Strategy section including, but not limited to, the following:
- A description of the intended uses for the data, and the necessary level of precision and accuracy for those intended uses; and,
- A description of methods and procedures to be used to assess the precision, accuracy, and completeness of the measurement data;
- Sampling section that shall include or describe, and reference or cite:
- Criteria for selecting appropriate sampling locations, depths, etc., or identification and justification of sample collection;
- Sampling methods including the identification of sampling equipment and a description of decontamination procedures to be used;
- Criteria for providing a statistically sufficient number of samples as defined in EPA guidance, or criteria for determining a technically sufficient number of measurements to meet the needs of the project as determined through the Data Quality Objective (DQO) planning process;
- Methods for, or specification of, measuring all necessary ancillary data;
- Criteria for establishing, or specification of, which parameters are to be measured at each sample collection point, and the frequency that each parameter is to be measured;
- Criteria for, or specification of, identifying the type of sampling (e.g., discrete), and number of samples to be collected;
- Criteria for, or specification of, measures to be taken to prevent contamination of the sampling equipment and cross contamination between sampling points;
- Methods and documentation of field sampling operations and procedure descriptions, as appropriate, including:
 - Procedure descriptions and forms for recording the exact location, sampling conditions, sampling equipment, and visual condition of samples;
 - Calibration of field devices (as applicable);
 - Collection of replicate samples;
 - Submission of field-biased blanks, where appropriate;
 - Potential interferences present at the facility;
 - Field equipment listing and sample containers;
 - Sampling order; and,
 - Descriptions of decontamination procedures.
- Selection of appropriate sample containers, as applicable;
- Sample preservation methods, as applicable; and,
- Chain-of-custody procedure descriptions as applicable, including:
 - Standardized field tracking reporting forms to establish sample custody in the field prior to, and during shipment; and,
 - Pre-prepared sample labels containing all information necessary for effective sample tracking, except where such information is generated in the field, in which case, blank spaces shall be provided on the pre-prepared sampling label.

- Certification that all samples obtained for analysis will be delivered to a responsible person, at the recipient laboratory, who is authorized to sign for incoming field samples, obtain documents of shipment, and verify the data entered onto the sample custody records;
- Provision for a laboratory sample custody log; and,
- Specification of chain-of-custody procedures for sample handling, storage, and disbursement for analysis.
- Sample storage procedure descriptions and storage times;
- Sample preparation methods;
- Descriptions of analytical procedures, including:
 - Scope and application of the procedure;
 - Sample matrix;
 - Potential interferences;
 - Precision and accuracy of the methodology; and,
 - Method detection limits.
- Descriptions of calibration procedures and frequency;
- Data reduction, validation, and reporting;
- Internal laboratory quality control checks, laboratory performance, and systems audits and frequency, include:
 - Method blank(s);
 - Laboratory control sample(s);
 - Calibration check sample(s);
 - Replicate sample(s);
 - Matrix-spiked sample(s);
 - “Blind” quality control;
 - Control charts;
 - Surrogate samples;
- Each QA/QC plan shall include a Data Management Plan, or equivalent, to document and track data and results.[WAC 173-303-380(1)(f)]. This plan shall identify and establish data documentation materials and procedures, project or unit file requirements, and project-related progress reporting procedures and documents. The storage location for the raw data shall be identified. The plan shall also provide the format to be used to record and, for projects, present the validated and invalidated data and conclusions.
- The Data Management Plan shall include the following as applicable:
 - A data record including the following:
 - Unique sample or field measurement code;
 - Sampling or field measurement location including surveyed horizontal coordinates and elevation of the sample location, and sample or measurement type;
 - Sampling or field measurement raw data;
 - Laboratory analysis identification (ID) number;
 - Result of analysis (e.g., concentration);
 - Tabular displays, as appropriate, illustrating:
 - Unsorted validated and invalidated data;
 - Results for each medium and each constituent monitored;
 - Data reduction for statistical analysis;
 - Sorting of data by potential stratification factors (e.g., location, soil layer, topography); and,
 - Summary data.
 - Graphical displays (e.g., bar graphs, line graphs, area or plan maps, isopleth plots, cross-sectional plots or transects, three dimensional graphs, etc.), as appropriate, presenting the following:
 - Displays of sampling location and sampling grid;

- Identification of boundaries of sampling area and areas where more data is required;
- Displays of concentrations of contamination at each sampling location;
- Displays of geographical extent of contamination;
- Aerial and vertical displays of contamination concentrations, concentration averages, and concentration maxima, including isoconcentration maps for contaminants found in environmental media at the Facility;
- Illustrations of changes in concentration in relation to distance from the source, time, depth, or other parameters;
- Identification of features affecting intramedia transport and identification of potential receptors.

QA personnel and technical experts evaluate the laboratory through onsite observations and/or reviews of the following documentation: copies of the QA/QC documents; records of surveillances/inspections; audits; non-conformances, and corrective actions. The 276-BA Organic Storage Area TK-ISO East operating organization ensures independent organizations; QA personnel and technical experts are qualified to perform these evaluations.

The overriding goal of the analytical program is to support the accurate designation of waste and/or demonstrate compliance to LDR standards. The certified laboratory QA/QC programs will be designed to meet the following objectives:

Minimize errors. Errors may be introduced during preparative, analytical, and/or reporting phases of work. QC program elements include analyses of samples in accordance with procedures.

The designation of waste relies on a combination of Knowledge, historical data, and additional analytical data. Laboratory QA/QC programs ensure accurate, precise, reliable, and reproducible data.

Key QA program elements are designed to provide objective evidence that waste analysis methods meet the performance specifications. QA activities and implementation responsibilities are as follows:

- Activity based laboratory inspections. Inspections will be performed by trained operating unit operating personnel. Inspections verify that specific guidelines, specifications, and procedures for the activities are completed successfully.
- Laboratory analyses. Analyses will be performed by onsite or offsite laboratories on samples of waste using procedures identified in Table 3.
- Development of inspection checklists. Checklists are required for laboratory inspections and are designed to ensure that the inspected activity is consistently addressed. Checklists will be completed during the inspection to document results.
- Instrument calibration and calibration verification. These activities are performed by the laboratory and are required for ensuring data of known accuracy and precision. Calibration data will be maintained and stored to ensure traceability to reported results.
- Laboratory QA/QC inspection results and instrumental calibrations will be documented in the unit-specific Administrative Record files.

Laboratory Quality Assurance/Quality Control

All analytical work will be defined and controlled by a statement of work or work order. These authorization documents will include QA/QC performance requirements. Samples will be handled according to controlled laboratory procedures. The accuracy, precision, and limitations of the analytical data are evaluated through QC performance parameters.

The unit group's operating organization will conduct review analyses to determine completeness of information and whether waste meets the acceptance criteria for treatment, storage, or disposal at one of the Hanford Facility TSD units or those of a chosen offsite TSD facility.

Data Assessment

Data used for decision making will be scientifically sound, of known quality, and thoroughly documented. Data will be assessed to determine compliance with the following:

Precision – The overall precision will be the agreement among the collected samples (duplicates) for the same parameters, at the same location, subjected to the same preparative and analytical techniques. Analytical precision will be the agreement among individual test portions taken from the same sample, for the same parameters, subjected to the same preparative and analytical techniques.

Accuracy – Accuracy of the measurement system will be evaluated by using QA samples, including certified standards, in-house standards, and proficiency testing samples.

Representativeness – Representativeness addresses the degree to which the data accurately and precisely represent a real characterization of the waste stream, parameter variation at a sampling point, sampling conditions and the environmental conditions at the time of sampling. The issue of representativeness is addressed for the following points:

- Based on the generating process, the waste stream, and its volume, there is an adequate number of sampling locations selected;
- The representativeness of selected media has been defined accurately;
- The sampling and analytical methodologies as defined in Table 3;
- The environmental conditions at the time of sampling will be documented in accordance with recordkeeping requirements.

Completeness – Completeness is the amount of usable data obtained from a measurement system compared to the total amount of data requested. The degree of completeness required for decision making must be defined in the statement of work or work order.

Comparability – Comparability is the confidence with which one data set can be compared to another. When comparability of data sets is a defined basis for decision making, the confidence level requirement must be specified in the statement of work or work order.

Attachment #3:

YN ERWM PROGRAM (YN) comments (and requests) on the Class 3 Modification to the Hanford site RCRA Permit for Closure of the 207-A South Retention Basin Permit Conditions

Introduction: While not enforceable, the introduction should present the relevant facts of unit operations and closure activities, please provide more details to include the following as well as definitions and application of all acronym terms.

- Clarify to include that 242-A Evaporator waste stream was from the DST.
- Include explanation of temporary authorization as the work was performed under this decision.
- Explain briefly the MTCA and SEPA processes.
- Explain the waste acceptance criteria at the Environmental Restoration Disposal Facility or other RCRA permitted facility and the process for disposal of cleanup waste-streams

Conditions:

V.5.A: Edit to include Please include Attachment 9, Permit Matrix within Condition (or include unit specific requirements relative to Attachment 9) permit condition or somewhere within the Closure Plan.

It is impossible for the public to make an informed decision as to whether Ecology has all the conditions necessary to protect human health and the environment without reviewing Attachment 9. Furthermore, this attachment is not listed on the Ecology public comment website for review of this permit modification. The public should not have to search the Ecology website to find a document listed as a major component of a RCRA permit.

Conditions V.5.B.3 thru 5 are rather straight forward, however, it is unclear how **Condition V.5.B.2** is even enforceable. There is no established schedule within the SAP or Addendum A to complete sampling or to submit a Data Analysis Report. How the permittee can possibly submit this report within 30 days of this permit modification? For what purpose is revised sampling required (it is not clear within this condition)? Furthermore Condition V.5.B.4 seems to conflict with what is required under Condition V.5.B.2. Has the final laboratory report already been completed? A type of final laboratory analytical report is somewhat mentioned within the SAP. Addendum A-page A.6 lines 3-7 do vaguely discuss conclusions, etc but nothing establishes a schedule or Data Analysis Report for Ecology review.

Edit **Condition V.5.B.2** to clearly state the following points:

- The *observational approach* to cleanup and sampling will be followed unless Condition V.5.B.5 is deemed to apply. (Note: Additionally, edit the SAP and Addendum A to also reflect the *observational sampling* approach.)
- Ecology may require additional sampling and/or investigation after the Permittees implement the approved Sampling and Analysis Plan if Ecology determines that the sampling and analyses have not adequately demonstrated whether clean closure has been achieved. Such a requirement will be implemented pursuant to WAC 173-303-830(3). Additional sampling and analysis may be required for the following reasons:
 - Specialized sample collection or analytical techniques are required to ensure adequate quantitation limits for chemical constituents; or
 - Results indicate the need to analyze for additional constituents at certain locations; or
 - Other reasons indicate the Sampling and Analysis Plan has not adequately demonstrated whether clean closure has been achieved.
- The Permittee will submit to Ecology a Data Analysis Report for review and determination as to whether additional sampling is required.

Edit Permit **Condition V.5.3** to clarify use of an AOC and applicable storage and sampling requirements per WAC 173-303-200. As written, it does not appear to be consistent with what is indicated within the Closure Plan. Additionally, sampling of an AOC must also confirm no exceedances of closure cleanup levels or additional closure action must be performed. Edit to reflect need for sampling of AOC. YN requests that there be no soils placed outside the cells but directly into ERDF containers. YN request that no bulk containers or 55 gallon drums be stored/staged adjacent to the basin.

Edit Permit **Conditions V.5.B.4 and V.5.B.5** to clearly reflect the following:

- The Permittees shall submit a contingent plan and post-closure plan for complying with WAC 173-303-610(8), 173-303-650(6) (c) (i) (A) and -650(6) (c) (i) (B) in the event that the removal and/or decontamination standards of WAC 173-303-650(6) (a) (i) cannot be achieved.

Edit draft Permit to include the following conditions: Note: Additionally, edit closure plan and Addendum A to reflect these additional conditions.

Condition V.5.B.6: Closure Performance Standards: The performance standards for soils based on the most stringent (lowest) of:

- Direct contact consistent with WAC 173-340-740(3)
- Soil concentrations to protect groundwater: derived using WAC 173-340-747(4) (with an exception of modified method B for hexavalent chromium using a Kd value of 0.)
- Protection of ecological receptors achieved through one of the following methods:
 1. Excavation of contaminated soil to a minimum of 15 feet below ground surface, or
 2. Excavation of contaminated soil such that residual soil concentrations do not exceed ecological screening levels listed in WAC 173-340-900 (Table 749-3), or
 3. A site-specific demonstration that remedial standards eliminate threats to ecological receptors.Should there be changes in MTCA prior to closure, there will be no 'back-sliding' to less stringent cleanup levels.

Condition V.5.B.7: Deviations from TSD unit closure plan required by unforeseen circumstances encountered during closure activities shall be documented in the TSD unit-specific Operating Record, and Ecology shall be notified within seven (7) days. Ecology shall be notified of the necessity to change the closure plan in accordance with WAC 173-303-830. Ecology must approve the modification prior to instigation of any actions.

Condition V.5.B.8: Backfilling locations disturbed by excavation of contaminated soil will be re-contoured in a manner that would support establishment of native plant communities and promote the aesthetic integrity of the landscape.

Edit to include new Permit Conditions for:

- Compliance with WAC 173-303-395 requirements as well as WAC 173-303-630 requirements with any on-site storage.
- Compliance to meet WAC 173-303-140 (LDRs). YN requests also request additional information regarding application of debris standards, etc within Introduction section and Closure Plan.