



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Richland Field Office

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September 9, 2022

22-NWP-135

Janice Catrell, Interim Chair  
Hanford Advisory Board  
245 Torbett Street  
Richland, Washington 99354

Re: Department of Ecology Response to Hanford Advisory Board Consensus Advice #313,  
"Responding to Leaking High-Level Radioactive Waste Tanks," March 24, 2022

Dear Janice Catrell:

The Department of Ecology (Ecology) thanks the Hanford Advisory Board (Board) for its Advice #313 to the United States Department of Energy (USDOE), Ecology, and the United States Environmental Protection Agency, Region 10 (EPA). The advice addresses responding to leaking single-shell tanks (SSTs) at the Hanford Site.

Ecology agrees with the Board that, as a policy, a more organized, consistent, and timely approach to identifying and proactively abating leaking single-shell tanks is critical.

Ecology recently issued an [Agreed Order](#) with USDOE. We believe the broad suite of near-term and long-term response actions required by the order is the best possible way to bring USDOE into compliance with regulatory requirements for leaking tanks. This agreement is consistent with the recommendations made by the Board in Advice #313. It is also consistent with our shared value to "do no harm during cleanup," as it does not require response actions that could ultimately do more harm than good. This was a guiding principle for Ecology throughout the discussions leading up to the Agreed Order.

The law requires USDOE to remove waste from a leaking tank at the earliest practicable time. The Agreed Order enforces that requirement and defines how and when USDOE will mitigate and reduce the spread of waste in the surrounding vadose zone from the active leaks in tanks B-109 and T-111 in the meantime. The agreement also sets the framework to accelerate response to future single-shell tank failures.

Provisions of the Agreed Order include:

- Cover the T and B tank farms with surface barriers to prevent rain or snowmelt from seeping into the tanks, and to slow the migration of leaked waste toward the groundwater.
- Evaluate the viability of installing a ventilation system to evaporate liquid waste in Tank B-109.
- Develop a response plan for future leaks from single-shell tanks.
- Evaluate conditions in and around tanks B-109 and T-111 to determine if additional work is needed to prevent rain or snowmelt from getting in.
- Explore ways to accelerate the schedule to retrieve waste from tanks B-109 and T-111.

The Tri-Party Agreement's existing System Plan process is the best tool we have to determine what constitutes the earliest practicable time for retrieving the two leaking tanks. This Agreed Order requires the ongoing System Plan 10 process to include this evaluation, which will serve as the basis for establishing new enforceable milestones for USDOE to retrieve those tanks as soon as practicable.

As Ecology implements the Agreed Order with USDOE, the public can provide input during the permitting process on the following submittals and decision points:

- The Single-Shell Tank System Leak Response Plan, upon incorporation into the SST System's Contingency Plan Addendum.
- Intrusion Response Work Plans for tanks B-109 and T-111 if needed, upon incorporation into the applicable Tier 3 closure plan(s).
- Design of interim surface barriers to cover T-Farm and B-Farm, upon incorporation into the Tier 2 closure plans for those tank farms.
- The leak response actions selected for implementation in response to future leaking SSTs, upon incorporation into the applicable Tier 3 closure plans.

We will also seek public comment on the creation of new Tri-Party Agreement milestones for retrieval of tanks B-109 and T-111, which will be based on the System Plan 10 evaluation of what constitutes the earliest practicable time for retrieval.

Washington State, in coordination with the diverse parties interested in the safe, effective, and efficient cleanup at Hanford, continues to elevate [budget and long-term consistent funding](#) needs to the Presidential Administration(s), Congressional Delegation, and the USDOE. Regardless of the treatment technology implemented to properly treat and dispose of Hanford waste, the Hanford Site needs to be adequately funded now and into the future.

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We thank the Board again for your valuable input on leaking single-shell tanks. Timely and knowledgeable public and stakeholder participation is essential to Hanford cleanup. Ecology looks forward to further collaboration with the Board, and to receiving public input on key decision points as the Agreed Order is implemented.

If you have any questions regarding the Agreed Order, please contact me at (509) 372-7905 or [david.bowen@ecy.wa.gov](mailto:david.bowen@ecy.wa.gov) or Ryan Miller, Communications Manager, at (509) 537-2228 or [ryan.miller@ecy.wa.gov](mailto:ryan.miller@ecy.wa.gov).

Sincerely,

David B. Bowen  
Program Manager  
Nuclear Waste Program

cc electronic:

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