Apr. 4, 2003

Keith Klein, Manager U.S. Department of Energy, Richland Operations P.O. Box 550 (A7-50) Richland, WA 99352

Roy Schepens, Manager U. S Department of Energy, Office of River Protection P.O. Box 450 Richland, WA 99352

John Iani, Regional Administrator U. S. Environmental Protection Agency, Region 10 1200 Sixth Avenue Seattle, WA 98101

Tom Fitzsimmons, Director Washington State Department of Ecology P.O. Box 47600 Olympia, WA 98504-7600

Subject: Groundwater Strategy and Groundwater Protection

Dear Messrs. Klein, Schepens, Iani, and Fitzsimmons,

The Hanford Advisory Board (Board) is encouraged by the recent focus on groundwater and clean-up issues consistent with the Board's long-standing and repeated advice. Activities must do no further harm to groundwater and groundwater should be cleaned up to its highest beneficial use. The Department of Energy's (DOE) Hanford Site Groundwater Strategy and Groundwater Implementation Plan, and all DOE plans, strategies and actions should reflect that goal. Specific areas of concern in the draft Groundwater Strategy include:

- Ensure significant groundwater technology development and implementation at Hanford is funded to meet the highest beneficial use groundwater cleanup goal.
- The strategy should include vadose zone monitoring as well as groundwater monitoring to provide early detection of contamination.

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- The strategy should include a specific standard of contamination that is a trigger for action when detected.
- The groundwater strategy and implementation plan should include a strategy for accelerated remediation of 618-10 & -11 burial grounds in order to achieve the goal of cleaning groundwater to its highest beneficial use.
- The groundwater strategy should incorporate the Board's prior advice that cleanup of groundwater to unrestricted use standards for each area along the Columbia River begin within one year of completion of that area's soil cleanup, and be complete by 2018. (See Board Advice 113)

The Board reiterates what it has said in previous advice - groundwater and source term remediation integration are key in achieving cleanup of groundwater to its highest beneficial use. The Exposure Scenario Task Force reached the same conclusion.

We appreciate the open communications that are currently ongoing and look forward to a continued dialogue on this most important issue.

Sincerely,

Todd Martin, Chair Hanford Advisory Board

This advice represents HAB consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: Jessie Roberson, Assistant Secretary of Energy, U.S. Department of Energy Headquarters

Bob Card, Under-Secretary of Energy, U.S. Department of Energy Headquarters

Marla Marvin, Deputy Designated Federal Official, U.S. Department of Energy

Michael Gearheard, Environmental Protection Agency Michael Wilson, Washington State Department of Ecology

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# Sandra Waisley, U.S. Department of Energy Headquarters The Oregon and Washington Congressional Delegations

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