

# HANFORD ADVISORY BOARD

*A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act*

## **Advising:**

US Dept of Energy  
US Environmental  
Protection Agency  
Washington State Dept  
of Ecology

## **CHAIR:**

Todd Martin

November 4, 2005

Keith Klein, Manager  
U.S. Department of Energy, Richland Operations  
P.O. Box 550 (A7-50)  
Richland, WA 99352  
Re: 200-UW-1 Waste Site Proposed Plan

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the Umatilla  
Washington State  
Department of Health

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

Re: 200-UW-1 Waste Site Proposal Plan

Dear Messrs. Klein and Manning,

## **Background**

The 200-UW-1 Area is the first soil site operable unit cleanup on the Central Plateau. Therefore, it is of great interest to the public and warrants very close scrutiny. It is commonly acknowledged that decisions made and lessons learned during the cleanup and closure of the 200-UW-1 area will be precedent-setting, influencing subsequent operable unit closure actions in the Central Plateau. As such, in Advice #177 the Hanford Advisory Board (Board) addressed multiple concerns.

The Board was pleased to receive an early response (September 9, 2005) from the Department of Energy (DOE) to our advice, rather than having to wait for the formal response to comments accompanying the Record of Decision (ROD). Early involvement and an iterative dialogue will help to clarify considerations and perspectives and we hope this will lead to better decisions. The Board recognizes that it has not yet received a response to our advice from the Washington Department of Ecology.

The Board is disappointed with DOE's response to our comments on the 200-UW-1 Proposed Plan. The response does not fully address all of our concerns as stated in Board Advice #177, and we strongly disagree with DOE's limited response.

Required relevant standards call for retrieval and permanent remedies to the extent practical, rather than reliance upon institutional controls and caps. While there is clearly deeper contamination that threatens groundwater, characterization

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Subject: 200-UW-1 Waste Site proposed Plan  
Adopted: November 4, 2005  
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measurements and modeling show that much of the contamination of high concern lies between 20 and 40 feet beneath the soil surface, and can be retrieved without the high costs and impracticalities of excavating to 200 feet. The Board's stated bias is for Remove, Treat, and Dispose as the preferred remediation pathway.

In addition, the 200-UW-1 Proposed Plan must include an Institutional Control plan covering all relevant time periods.

Consequently, we wish to reiterate and expand on our previous advice.

### **Board Advice:**

- We continue to advise that the proposed plan be revised as previously recommended, ensuring compliance with the Model Toxics Control Act (MTCA) and the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). In addition, we advise the inclusion of additional analyses, as follows, with cost comparisons of alternative compliant technology and schedules for public review and comment on:
  - An analysis of excavation to a depth of 20-40 feet. The Board believes that the initial evaluation of an excavation to a 200-foot depth utilized an unrealistic scenario. A more strategic approach, minimizing excavation depth, but addressing high source-term contamination removal, should be fully evaluated.
  - An analysis of the loss of institutional controls before 150 years. DOE needs to revise their IC Plan to identify what actions will be taken after site closure to prevent radiation hazardous exposure to non-DOE workers/residents/Native Americans. DOE also needs to identify the federal agency responsible for any post-closure control actions and corresponding funding source and level for that agency. Additionally, DOE should engage the Board and the public in discussions regarding recommended IC Plan changes.
  - An analysis of As Low as Reasonably Achievable (ALARA) calculations regarding waste site remediation considering all existing new or emerging technologies for retrieval, treatment and disposal (e.g., remote handling, guzzlers and soil solidification).
- Before capping is selected as a method of final disposition for a waste site, DOE should demonstrate how it has applied Board Advice #173 in its decision making process.

Sincerely,



Todd Martin, Chair  
Hanford Advisory Board

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*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: Michael Bogert, U.S. Environmental Protection Agency, Region 10  
Howard Gnnann, Deputy Designated Federal Official, U.S. Department of Energy  
Nick Ceto, Environmental Protection Agency  
Michael Wilson, Washington State Department of Ecology  
Melissa Nielson, U.S. Department of Energy Headquarters  
The Oregon and Washington Congressional Delegations

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