

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

Nov. 7, 2003

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Washington State Department of Ecology
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Re: M-24 Groundwater Well-Drilling Change Package

Dear Msrs. Klein, Schepens, Iani, and Ms. Hoffman,

The Hanford Advisory Board (Board) has for years recommended the Department of Energy (DOE) adequately fund the development of a compliant groundwater monitoring system and adequately characterize the subsurface to support the decision making process (Advice #65, 107, 120, and 145). We are encouraged with progress that has been made as evidenced by the proposed change package. A compliant system is necessary to protect human health and the environment for the long term as well as being needed to support cleanup decisions. We don't believe the proposed M-24 well drilling milestone changes assure creation of a compliant monitoring network.

Accordingly, the Board offers the following advice on the M-24 milestone change package:

- ❖ DOE should fully fund the drilling of the 67 wells identified in the milestone to ensure installation of all wells as soon as possible.

HAB Consensus Advice #152
Subject: M-24 Groundwater Well-Drilling Change Package
Adopted: Nov. 7, 2003

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- ❖ The currently assumed 15 well installations per year should be required as a *minimum* in the milestone.
- ❖ The Tri Party Agreement (TPA) agencies should define a compliant monitoring network (that includes a soil column reaching from the surface through the groundwater) for all waste sites and facilities, including the locations, purposes and proposed contaminants of concern. We recognize that this plan will need to be revised as wells are drilled and new information is gained, but believe that development of such a plan, in an open transparent process, subject to public review, will ensure that monitoring needs already identified in Ecology and Environmental Protection Agency inspections and notices are included. TPA milestones should then be negotiated to ensure such a network is initially attained within four years and maintained.
- ❖ In keeping with the Board's advice on the site-wide groundwater strategy (Advice #145), a monitoring network plan should include the complete soil column (as defined above) monitoring for early detection and characterization.

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
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