



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

Mary Riveland, Director  
Washington Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600

John Wagoner, Manager  
Department of Energy, Richland Operations  
PO Box 550 (A7-50)  
Richland, WA 99352

August 3, 1995

RE: 100 AREA REMEDIATION

Dear Messrs. Clarke and Wagoner, and Ms. Riveland:

The Hanford Advisory Board submits the following advice as its comments on your proposed 100 area actions.

**PROPOSED PLAN FOR FINAL RESOLUTION OF THE 100-IU-1, 100-IU-3, 100-IU-4 AND 100-IU-5 OPERABLE UNITS.**

The board supports the agencies' preferred alternative of "No Further Action" for these sites. They have been cleaned up under Expedited Response Actions which removed all hazardous substances to meet the residential use cleanup standards of the Washington Model Toxics Control Act. There is no apparent residual radioactive contamination above background levels at the sites. The sites are unlikely to pose any significant risk to health or the environment.

**PROPOSED PLANS FOR INTERIM REMEDIAL MEASURES AT THE 100-BC-1, 100-DR-1 AND 100-HR-1 OPERABLE UNITS.**

The Board supports the agencies' preferred alternative to remove, treat (as appropriate or required) and dispose of the contaminated soil and associated structures from selected source areas within the three 100 Areas. We agree with the agencies that these former liquid waste disposal sites are high priority because of their potential health and ecological threats to groundwater and the Columbia River. The proposed actions support the major stakeholder values of protecting the river and getting on with cleanup. In addition, these actions will provide needed information and experience that will be valuable in later cleanup projects.

The Board's Consensus Advice #23 and the TPA's response to it concurred with the cleanup standards to be used for hazardous chemicals and radio nuclides in these remediation actions. We note that the agencies have not yet agreed on the approach for groundwater protection. We request that the Environmental Restoration Committee of the HAB be kept informed on this issue and that the Board have an opportunity to concur in the selected standard.

The Board notes that a change package has been submitted to redesignate the 100HR-1 and the 100-DR1 Operable Units from RCRA to CRCLA Past Practice Units in order that the waste may be disposed of in the ERDF (a CERCLA facility). Our understanding is that this is an administrative and not a technical issue. We request that the Environmental Restoration Committee of the Hanford Advisory Board be kept informed on this issue.

The Board looks forward to your written response, as called for in our charter.

Very truly yours,

Merilyn B. Reeves, Chair  
Hanford Advisory Board

cc: Thomas Grumbly, Department of Energy  
Cindy Kelly, Designated Federal Official  
Linda Lingle, Site Representative  
The Oregon and Washington Congressional Delegations

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*For questions or comments, please send [email](mailto:Hanford_Advisory_Board@rl.gov) to Hanford\_Advisory\_Board@rl.gov*

*HAB Consensus Advice #27*

*Subject: 100 Area Remediation*

*Adopted: August 3-4, 1995*