

Department of Energy

Richland Operations Office P.O. Box 550 Richland, Washington 99352

FEB 2 6 2004

04-AMCP-0101

Mr. Todd Martin, Chair Hanford Advisory Board 1933 Jadwin Avenue, Suite 135 Richland, Washington 99352

Dear Mr. Martin:

RESPONSE TO CONSENSUS ADVICE #153, NEED FOR SITE-WIDE CUMULATIVE IMPACT ANALYSIS AND RECEIPT OF OFFSITE WASTE

The Hanford Advisory Board (HAB) recommended that offsite waste not be disposed of at Hanford until DOE completes a cumulative site-wide impact analysis. In addition, the HAB recommended the Tri-Parties create a milestone to ensure that analysis is completed.

DOE is currently limiting receipt of low-level waste for disposal at Hanford to waste generated at the Site and waste from "existing" offsite (non-Hanford) generators. DOE is not currently accepting any mixed low-level waste from offsite DOE generators.

The potential incremental impacts of disposing waste from onsite and offsite generators at Hanford are presented in the Hanford Site Solid (Radioactive and Hazardous) Waste Program Environmental Impact Statement (HSW EIS). The HSW EIS evaluated a Hanford-only waste volume as well as Hanford waste plus offsite waste volumes represented by a lower bound waste volume and an upper bound waste volume for each of the action alternatives. The analyses presented in the revised HSW EIS indicate that there were only minimal differences in the impacts between the Hanford-only and upper bound waste volumes.

A cumulative site-wide analysis was performed as part of the HSW EIS consistent with National Environmental Policy Act requirements and the Council of Environmental Quality regulations. Public comments on the HSW EIS, including those relating to cumulative impacts, have been addressed as part of the HSW EIS. DOE has met applicable legal requirements and no new Tri-Party Agreement milestone is appropriate. DOE notes that the U.S. Environmental Protection Agency, in its response to the HAB dated January 28, 2004, also indicated that no new milestone is appropriate.

If you have questions, please contact me or Matthew McCormick, Office of the Assistant Manager for the Central Plateau, on (509) 376-6536.

Sincerely

Keith A. Klein

Manager

AMCP:MSC

cc: See Page 2

Mr. Todd Martin 04-AMCP-0101

cc: N. Ceto, EPA
L. Hoffman, Ecology
John Iani, EPA
M. A. Wilson, Ecology

U.S. Senators (WA)
Maria Cantwell
Patty Murray

U.S. Senators (OR) Gordon H. Smith Ron Wyden

U.S. Representatives (WA)
Brian Baird
Norm Dicks
Jennifer Dunn
Jay Inslee
Richard Hastings
Rick Larsen
Jim McDermott
George Nethercutt
Adam Smith

U.S. Representatives (OR)
Earl Blumenauer
Peter DeFazio
Darlene Hooley
Greg Walden
David Wu

State Senators (WA)
Pat Hale
Mike Hewitt

State Representatives (WA)
Jerome Delvin
Shirley Hankins

E-STARS[™] Report Task Detail Report 02/26/2004 1022

TASK INFORMATI	ON	<u> </u>	
ľask#	DOE-AMCP-C-2004-0101		
Subject	RESPONSE TO CONSENSUS ADVICE #153, NEED ANALYSIS AND RECEIPT OFFSITE WASTE	FOR SITE-WIDE CUMU	ILATIVE IMPACT
Parent Task#		Status	Open
Reference		Due	02/23/2004
riginator	Castleberry, Connie J	Priority	None
Originator Phone	(509) 376-1366	Category	None
Origination Date	12/03/2003 1353	Generic1	
Remote Task#		Generic2	
Deliverable	None	Generic3	
Class	None	View Permissions	Normal
ROUTING LISTS	AMCP Off File AMCP Rdg File C. J. Castleberry, AMCP C. C. Clark, COM M. S. Collins, AMCP J. J. Fiore, EM-43 K. M. Hintzen, AMCP M. S. McCormick, AMCP Y. T. Sherman, COM K. M. Thompson, AMCP RECORD NOTE: The HAB provided comments on tadvice #148). EPA responded to the HAB indicatin "appropriate vehicle to conduct a site-wide analyst response, the HAB advised not "to add the offsite the Hanford Site's soil" until after the CERCLA/RCI Party Agreement Milestones M-15 and M-45 are in Changes were made to the attached letter Februa rerouted for your concurrence. Colleen Clark's, CO were incorporated 02-23-04.	ng differences in views is of cumulative impac wastes considered in t RA investigations asso net (currently schedule iry 9, 2004, by Michael	regarding the regarding the draft HSW-EIS to clated with the Tried in 2008). Collins and is being s, OCC, comments
1	Route List		Active
	Collins, Michael S - Approve - Approved - 12/0	3/2003 1518	
	Robertson, Owen C - Approve - Approved - 12,	/03/2003 1514	RECEIVE
	• Thompson, Mike - Approve - Approved - 12/04	/2003 0704	FEB 2 6 2004
	Morse, John G - Approve - Approved - 12/03/2	2003 1520	DOE-RL/RL
	• Hildebrand, R Doug - Approve - Approved - 12,	/03/2003 1428	DOE-UT/UF
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	 Marvin, Marla K - Approve - Approved with con 	nments - 12/17/2003	1501

	Sherman, Yvonne T - Approve - Approved -	02/23/2004 1105	
	Clark, Colleen C - Approve - Approved with		4 1105
	McCormick, Matthew S - Approve - Approve		
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	Weis, Michael J - Approve - Approved - 02/		CONTRACTOR
*****************	Klein, Keith A - Approve - Approved - 02/26	5/2004 0801	***************************************
2	Route List		Draft
No Assignees			
ATTACHMENTS			*****
Attachments	1. 04-AMCP-0101 BACKGROUND.pdf 2. 04-AMCP-0101msc.doc		
COMMENTS			
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Poster	Dunigan, Paul F (Dunigan, Paul F) - 01/08/200	04 0401	***
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E-STARS Page 3 of 3

SUB TASK HIST	ORY
Subtask#	DOE-AMCP-C-2004-0101.1
Subject	RESPONSE TO CONSENSUS ADVICE #153, NEED FOR SITE-WIDE CUMULATIVE IMPACT ANALYSIS AND RECEIPT OFFSITE WASTE
Originator	Hollowell, Betty L
Party Control of the	Routing List No Active Routing List

-- end of report --

E-STARS[™] Report Task Detail Report 02/24/2004 0140

TASK INFORMATI	ON		
Task#	DOE-AMCP-C-2004-0101		
Subject	RESPONSE TO CONSENSUS ADVICE #153, NEED FOR SITE-WIDE CUMULATIVE IMPACT ANALYSIS AND RECEIPT OFFSITE WASTE		
Parent Task#		tatus	Open
Reference	D	ue	02/23/2004
Originator	Castleberry, Connie J P	riority	None
Originator Phone	(509) 376-1366 C	ategory	None
Origination Date	12/03/2003 1353 G	eneric1	
Remote Task#	G	eneric2	
Deliverable	None G	eneric3	
Class	None V	lew Permissions	Normal
	AMCP Off File AMCP Rdg File C. J. Castleberry, AMCP C. C. Clark, COM M. S. Collins, AMCP J. J. Fiore, EM-43 K. M. Hintzen, AMCP M. S. McCormick, AMCP Y. T. Sherman, COM K. M. Thompson, AMCP RECORD NOTE: The HAB provided comments on the radvice #148). EPA responded to the HAB indicating do "appropriate vehicle to conduct a site-wide analysis or response, the HAB advised not "to add the offsite was the Hanford Site's soil" until after the CERCLA/RCRA in Party Agreement Milestones M-15 and M-45 are met of Changes were made to the attached letter February 9 rerouted for your concurrence. Colleen Clark's, COM,	lifferences in views f cumulative impactive impactives considered in the investigations associatives currently schedule 2, 2004, by Michael	regarding the ts." Based on EPA' he draft HSW-EIS clated with the Trid in 2008). Collins and is bein
ROUTING LISTS	were incorporated 02-23-04.		
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Poster	Marvin, Marla K (Avery, Susan E) - 12/17/2003	3 0312	
	Approve		
	12/17/03 - Marla concurred w/corrections by h	ard copy. ~SEA	
Poster	Dunigan, Paul F (Dunigan, Paul F) - 01/08/200		
	Approve		
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SUB TASK HISTO), Year of the state of the st
Subtask#	DOE-AMCP-C-2004-0101.1
Subject	RESPONSE TO CONSENSUS ADVICE #153, NEED FOR SITE-WIDE CUMULATIVE IMPACT ANALYSIS AND RECEIPT OFFSITE WASTE
Originator	Hollowell, Betty L
	Routing List No Active Routing List

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JV

E-STARS[™] Report Task Detail Report 02/23/2004 1124

rask informati	ON		
Γask#	DOE-AMCP-C-2004-0101		
Subject	RESPONSE TO CONSENSUS ADVICE #153, NEED FOR SITE-WIDE CUMULATIVE IMPACT ANALYSIS AND RECEIPT OFFSITE WASTE		
Parent Task#		Status	Open
Reference		Due	02/23/2004
Originator	Castleberry, Connie J	Priority	None
Originator Phone	(509) 376-1366	Category	None
Origination Date	12/03/2003 1353	Generic1	
Remote Task#		Generic2	
Deliverable	None	Generic3	
Class	None	View Permissions	Normal
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	Clark, Colleen C - Approve - Approved with	**	
***************************************	McCormick, Matthew S - Approve - Awaitin	g Response W	425/04
	Route List	Y	Draft
No Assignees			
TTACHMENTS			
Attachments	1. 04-AMCP-0101msc.doc		
COMMENTS			
Poster	Marvin, Marla K (Avery, Susan E) - 12/17/2003 0312		
	Approve		
	12/17/03 - Marla concurred w/corrections by	hard copy. ~SEA	
Poster	Dunigan, Paul F (Dunigan, Paul F) - 01/08/20	04 0401	nida, aata raakii na mada ka
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	Paragraph 2, line 2: insert "potential impacts Paragraph 2, line 3: insert "the impacts of" be insert "past, present and reasonably forseeabl Paragraph 2, line 4: delete "typically".  Paragraph 2, lines 8 and 9: replace "comparer Paragraph 2, line 9: delete "cumulative site-w Paragraph 2, line 9: replace "Hanford activitie the Hanford area".	etween "in relation to" le" between "other" and d to the" with "considere ride".	and "other", and "actions that may" d together with"
	PFXDJr. 1/8/04		
Poster	Hollowell, Betty L (Dawson, Jodi L) - 02/19/20	004 0402	
	Approve		•
	Approval contingent on the incorporation of comments were worked on by Y. Sherman, M.		
Poster	Clark, Colleen C (Avery, Susan E) - 02/23/200	04 1102	
	Approve		
	2/23/04 - Approve w/comments. ~SEA		
TASK DUE DATI	E HISTORY		
Modified	01/05/2004 1104 - Castleberry, Connie J (Castleberry, Connie J)	New Due Date	01/08/2004 1700
Modified	02/10/2004 1508 - Castleberry, Connie J (Castleberry, Connie J)	New Due Date	02/20/2004 1700
Modified	02/23/2004 1124 - Castleberry, Connie J (Castleberry, Connie J)	New Due Date	02/23/2004 1700
	*******		<b>.</b>
SUB TASK HIST	IORY		
SUB TASK HIST Subtask#	DOE-AMCP-C-2004-0101.1		
		EED FOR SITE-WIDE CUN	MULATIVE IMPACT

Routing List No Active Routing List

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