



DEC 09 2005

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

Dear Mr. Martin:

**RESPONSE TO HANFORD ADVISORY BOARD (HAB) CONSENSUS ADVICE #175,
INTEGRATED DISPOSAL FACILITY (IDF) PERMIT**

- References:
1. HAB letter from T. Martin to K. A. Klein, RL, et. al., "Response to Consensus Advice #175, Integrated Disposal Facility Permit," dated June 17, 2005.
 2. Ecology letter from J. J. Manning to R. J. Schepens, ORP and E. S. Aromi, CH2M HILL, "Requesting for a Temporary Authorization to Continue Construction at the Integrated Disposal Facility," dated August 16, 2005.
 3. RL letter from K. A. Klein, to T. Martin, HAB, "Response to Consensus Advice #153, Need for Site-Wide Cumulative Impact Analysis and Receipt of Offsite Waste," dated February 26, 2004.

This letter responds to the HAB consensus Advice #175, IDF permit, that advised the U.S. Department of Energy (DOE) to modify the IDF Resource Conservation and Recovery Act (RCRA) Part B permit (Reference 1) to "ensure that subsequent permit modifications require cumulative risk analysis of all wastes previously disposed of in the IDF in addition to those proposed in the future IDF permit modifications."

The permit conditions enclosed with the August 16, 2005, letter (Reference 2) from the State of Washington Department of Ecology require DOE, Office of River Protection (ORP) to create and maintain a modeling-risk budget tool and to utilize the tool in a cumulative risk analysis of all waste previously disposed of in the entire IDF and those wastes expected to be disposed of in the future. (See Condition III.11.I.5.) ORP expects this condition to be included in the final Part B RCRA permit for the IDF.


In addition, the Performance Assessment required by DOE Order 435.1 addresses the cumulative impacts of all anticipated low-level and mixed low-level wastes. Future performance assessments for IDF will be based on updated information about waste types and quantities actually disposed of in IDF as well as those still anticipated.

In summary, we believe analyses planned for the IDF, as outlined in the Draft Permit condition, are already consistent with the intent of HAB Advice Item 1. However,

State of Washington Department of Ecology plans to modify the permit condition to reflect the emphasis requested by the comment.


With regard to HAB Advice Item 2, the agencies agree that there is a need for a cumulative risk assessment and that such an assessment would be helpful when examining projects like the IDF.

If you have any questions, please contact me, or your staff may contact T. Zack Smith, Assistant Manager Tank Farms, (509) 373-9112.


Roy J. Schepens
U.S. Department of Energy
Office of River Protection


Keith A. Klein
U.S. Department of Energy
Richland Operations Office


Nicholas Ceto
U.S. Environmental
Protection Agency


Jay Manning
State of Washington
Department of Ecology

TPD:PEL

cc: N. Ceto, EPA
T. Holm, EnviroIssues
M. Wilson, Ecology
M. Nielson, DOE-HQ
The Oregon and Washington
Congressional Delegations

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Brian Baird Jim McDermott
Norm Dicks Cathy McMorris
Richard Hastings David Reichert
Jay Inslee Adam Smith
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