



November 5, 1999

Keith Klein, Manager
U.S. Department of Energy, Richland Operations
P.O. Box 550 (A7-50)
Richland, WA 99352

Subject: 100 Area Cleanup Objectives

Dear Mr. Klein:

The Hanford Advisory Board (Board) requests clarification of the U.S. Department of Energy - Richland Operations (DOE-RL) concurrence on the Inspector General's Report recommendations, dated June 1999, particularly as these relate to the River Corridor.

IG Recommendations:

1. Seek to amend the 1995 Interim ROD in order to achieve cleanup levels that are consistent with land use decisions, no later than issuance of the HRA-EIS ROD in November 1999, and
2. Challenge future RODs having cleanup objectives that are inconsistent with projected land uses.

This report was completed prior to your arrival and the DOE-RL Acting Manager gave a non-concurrence with Recommendation #1 and a concurrence with Recommendation #2. In light of the April 28, 1999, memorandum from the Acting Manager, we would like clarification from you on DOE-RL's cleanup goals and the basis for setting cleanup levels. Please state DOE-RL's position on its natural resource and treaty trust obligations, the relationship of land use to health-based cleanup levels, DOE's commitment and plans to meet health-based standards in CERCLA and Washington's Model Toxics Control Act regulations, and the relationship of interim RODs to long-term environmental protection.

The Board strongly disagrees with the apparent thrust of the IG recommendations that cleanup levels should be less stringent than the current requirements for the River Corridor. The HAB has taken this stance since its first piece of advice, in June 1994, adopting the values in the Future Site Uses Working Group and the Tank Waste Task Force (Enclosure 1). This position was reinforced in the HAB's Consensus Advice #23 on May 4, 1995 (Enclosure 2).

Very truly yours,

Merilyn B. Reeves, Chair
Hanford Advisory Board

Enclosures

cc:
Tom Fitzsimmons, Washington Department of Ecology

Chuck Clarke, U.S. Environmental Protection Agency, Region 10
Pete Knollmeyer, Acting Deputy Designated Federal Official
Gregory H. Friedman, DOE - Office of Inspector General
The Oregon and Washington Congressional Delegations
Michael Gearheard, Environmental Protection Agency
Dan Silver, Washington Department of Ecology

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