



September 6, 1996

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Chuck Clarke, Regional Administrator
U.S. Environmental Protection Agency, Region 10
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Mary Riveland, Director
Washington Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Re: Tri-Party Agreement M33/M90 Change Package

Solid Waste Integration Milestone (HAB Advice #53)

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

This proposed change package fulfills a commitment in Amendment 4 to the TPA to establish new milestones for "the acquisition of new facilities, modification of existing facilities, or modification of planned facilities for treatment, storage and/or disposal of solid waste materials based upon the results of the Site Wide Systems Analysis".

The Hanford Advisory Board (HAB) has been regularly provided with progress reports over the past year concerning progress toward developing the draft proposals. Review of the proposed change package by Health, Safety and Waste Management Committee members has engendered no apparent critical response. The Board, therefore, has no advice concerning changes in the substance of the proposed changes.

The HAB commends DOE, EPA and Ecology for the public involvement process that contributed to the final product. Some of the things that happened as a result of the Board's involvement during the process of developing the M-90 milestones were recognition of the lack of:

- an authoritative estimate of the nature and size of the various waste streams;
- "buy in" into the planning process by the "owners" of programs generating and/or managing solid waste streams;
- integration in dealing with waste streams; and
- understanding of public values bearing on this issue.

Initially, DOE seemed in a rush to avoid “missing” the M33 milestone commitment. The HAB response was to support the development of a plan that would effectively guide the treatment, storage and disposal of solid wastes at the Hanford site. To this end, the Board advised DOE and the regulators early in the process that the required dates for submittal of a signed change request and completion of negotiations should be extended by three months.

DOE and the regulators involved the program/project managers and board members in the milestone development process on the draft milestones, developed a comprehensive inventory of the nature and volumes of solid wastes on the Hanford site and deferred the milestone development deadline by three months. In the course of the change package development over time, discussions among all concerned resulted in better appreciation of the public’s concerns and objectives for treatment, storage and disposal of these wastes. Most importantly, the milestone development project became a catalyst for beginning effective integration of programs/projects dealing with the same waste streams.

As a result, of the public’s involvement, much has been gained in understanding the nature and volume of these wastes while the integration of the management of the waste strams will facilitate the treatment, storage and disposal of these wastes in a more cost effective manner.

DOE, EPA and Ecology are commended for developing a better plan and making the planning/negotiation process one that was open and supported the broader benefits noted above.

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: Cindy Kelly, Designated Federal Official
Linda Lingle, Site Representative
The Oregon and Washington Congressional Delegations

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HAB Consensus Advice #53

Subject: Tri-Party Agreement M33/M90 Change Package Solid Waste Integration Milestone

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