



September 5, 1997

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Subject: ERDF Expansion

Dear Messrs. Clarke, Fitzsimmons and Wagoner:

The U.S. Environmental Protection Agency, the Washington State Department of Ecology, and the U.S. Department of Energy are proposing an amendment to the *Environmental Restoration Disposal Facility Record of Decision* (ERDF ROD). The proposed amendment has two elements: (1) construction of two new disposal cells at ERDF and (2) authorization for centralized waste treatment at ERDF.

When the Tri-Party agencies originally proposed the design and construction of the ERDF, the Board raised issues about its size, location, and impacts on habitat. However, the HAB has consistently supported the ERDF. In Consensus Advice #2, the HAB endorsed the development of ERDF for disposal of waste from the Hanford cleanup only. Although the Board did not come to consensus on the advisability of building the ERDF in phases, there was support for the concept among many members. In the July 1996 Board meeting, the Board supported a change to allow the ERDF to also accept RCRA waste from Hanford that is similar to the cleanup wastes already going into the ERDF.

Advice

1. The HAB supports both elements of the *Proposed Plan for an Amendment to the Environmental Restoration Disposal Facility Record of Decision*: (a) construction of Phase II of ERDF for disposal of Hanford Site waste only, and (b) authorization for treatment of Hanford Site waste at ERDF.
2. The HAB recommends that U.S. DOE report the full cost for disposal of waste at ERDF including costs of design, construction, maintenance, monitoring, mitigation, and closure. U.S. DOE should use the full cost of disposal at ERDF when comparing the costs of other remediation technologies.

We look forward to your response and to periodic progress updates on this matter.

Very truly yours,

Merilyn B. Reeves, Chair
Hanford Advisory Board

cc: Al Alm, DOE-HQ
Alice Murphy, Designated Federal Official
The Oregon and Washington Congressional Delegations
Randy Smith, Environmental Protection Agency
Dan Silver, Washington Department of Ecology

This advice represents HAB consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

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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 #75
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