



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

1200 Sixth Avenue  
Seattle, Washington 98101  
March 28, 1996

Reply To  
Attn Of: ECL-117

Merilyn B. Reeves, Chair  
Hanford Advisory Board  
22250 Boulder Crest Lane, S.E.  
Amity, Oregon 97101

Re: Hanford Advisory Board Advice Responses

Dear Ms. Reeves:

The following are responses to several Hanford Advisory Board Advice packages:

26: Defending the TPA in the Face of Emerging Legislative Initiatives

The U.S. Environmental Protection Agency (EPA) agrees with the Board's advice to defend the integrity of the Tri-Party Agreement. The ER Program is the primary focus as EPA works with the U.S. Department of Energy (DOE) on the 1998 budget. The use of the TPA in developing DOE's funding priorities during budget tightening is essential to the success of the Hanford cleanup.

31: M-33 Integrated Strategy for the Acquisition of Facilities for Storage, Processing, and/or Disposal of Solid Waste and Materials

The advice recommended extending the Agreement-In-Principle by three months for M-33 negotiations. EPA agreed to this advice verbally at the September 1995 Board meeting. Negotiations are currently ongoing on M-33 issues and EPA recognized the complex nature of the problem to be addressed in these negotiations. The agencies have adopted the one regulator concept since September that was detailed in Amendment Six to the TPA. Subsequently, Ecology has assumed lead regulatory responsibility for the M-33 negotiations. Although EPA is no longer directly involved in these negotiations, the capabilities needed to fulfill the intent of this milestone are required to support future 300 Area cleanup efforts on which we have regulatory oversight. EPA shall continue to follow these negotiations to ensure the ER Program needs are met.

**36: Review of FY 96 BEMR, MYPP and "Site Level Assumptions"**

EPA agrees with your recommendations regarding BEMR, MYPP and Site Level Assumptions and EPA agrees that the TPA and the Future Site Uses Working Group recommendations should be the basis of the current baseline. EPA and Ecology reinforced many of the same issues highlighted in your advice in a letter issued to DOE in late February. It is imperative that Energy engage the regulators, tribes and public in dialogue before changing any baseline assumptions. EPA looks forward to working with the Board as the DOE begins discussing their new strategic directions.

**40: Hanford Site-Wide Groundwater Remediation Strategy**

The advice letter covers three areas of the Hanford Groundwater Program. EPA agrees with the Board's comments on the Groundwater Remediation Strategy document. We believe that there is a sound groundwater remediation program in place at Hanford as stated in the February meeting. The Board's second piece of advice is to continue the 100 Area pump and treat activities for chromium and strontium. EPA agrees with this advice and the ROD is nearly ready for signature recommending chromium pump and treat. The Board's third piece of advice is regarding the N-Springs experimental barrier. EPA agrees with the Board's advice that although this may be a promising technology, the ER Programs' first responsibility is to continue funding the current pump and treat operation.

**41: FY 96 Hanford Cleanup Budget Reallocation**

EPA has reviewed and agrees with most of the recommendations contained in the Board's advice on 1996 budget reallocations. EPA agrees that DOE should not be using new assumptions prior to full public and regulator dialogue. EPA also agrees with the Board's comments regarding overhead and indirect charges, as well as program management.

EPA does not fully agree with the Board's advice regarding ER. EPA believes that DOE does have sufficient funding to accelerate work in the 100 Area and protect the Columbia River in FY 96.

**42. Proposed Plan for the Interim Action on the 300-FF-5 Operable Unit**

The public comment on 300-FF-5 has been completed and the public overall supports the proposal to continue monitoring the 300 Area Groundwater. EPA is currently in the process of drafting the ROD for this unit. It is expected that the ROD will

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be issued in the next several months. It should be noted that five year reviews will be required for this operable unit.

The following advice packages were sent to Energy only and EPA will not be responding. They are: Advice #28, 29, 30, 32, 33, 34, 35, 37, 38, 39 and 43.

EPA has struggled to provide the Board with timely written responses to Board's advice packages as evidenced by the number of issues addressed in this letter. However, I want to assure you that EPA listens to the Board's discussions and your recommendations are always considered in our decision-making process.

It has been a pleasure working with the Board over the past few years. I look forward to many more productive meetings in the future.

Sincerely,



Randy Smith

Randall F. Smith, Director  
Environmental Cleanup Office

cc: Ron Izatt, DOE  
Alice Murphy, DOE  
Dan Silver, Ecology