



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

RECEIVED

JUN 02 1997

Reply To  
Attn Of: ECL-117

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

Re: Hanford Advisory Board Advice Responses

Dear Ms. Reeves:

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

Institutional Controls: Advice #63

The U.S. Environmental Protection Agency (EPA) would like to take this opportunity to thank the Board for their diligent work regarding institutional controls. The issue first arose through the work the Board did on the U.S. Department of Energy's (DOE) strategic planning. The Board developed principles which will be helpful as decisions are made at Hanford over the next several years. Specific points are addressed below:

Principle 1: EPA agrees that the institutional controls should not be substituted for cleanup activities and should only be applied when other treatment methods are unavailable. This advice is also consistent with Superfund law.

Principle 2: EPA agrees with the Board's discussion and advice that the regulators are the appropriate parties to determine when and where institutional controls should be applied and that the same risk-based rules should be applied at Hanford as it is off-site. The Board meeting highlighted the process of selecting institutional controls.

Principles 3,4,7, and 8: Points out constructive ideas on how the agencies can work with local government and tribal nations to develop effective mechanisms to apply institutional controls. The Board's work on this issue highlighted the fact that currently there is not a sound system in place to track institutional controls if land is transferred out of DOE's

deliberate and open public discussion on how it will manage the department's plutonium inventory and low-level, mixed, and transuranic wastes in the future.

TWRS Vadose Zone Characterization: Advice #67

We agree with the points discussed in your letter. It is imperative that DOE collect information on contaminant migration in the 200 Area Vadose Zone in order to begin an effective tank removal program. Characterization of the 200 Area Vadose Zone will be a priority for EPA over the next several years.

New Funding Principle: Advice #69

EPA appreciates the Board's adoption of the principles directed at DOE regarding the unacceptableness of DOE-HQ's to add "unfunded mandates" to DOE-RL's budget and that it is unacceptable for DOE to fund non-environmental management activities with environmental management funds. EPA fully endorses these principles and will use them as we review DOE's budget submittal.

FY 99 DOE-RL Budget: Advice #70

This advice was directed at DOE, but I want to take this opportunity to express my appreciation to the Board regarding your work on the DOE budget. The Board's involvement in the budget process is unprecedented in this country. The requirement for DOE to share budget information with the public has been in the TPA since it was signed in 1989. It is not until the last two years that DOE has been able to develop an effective public involvement program to meet these requirements as they were intended. I believe it is because of the Board's diligence on the budget that this has occurred. EPA's specific comments on DOE's 1999 budget will be forthcoming in a separate letter.

If you have any questions, please call me at (206) 553-1261 or Doug Sherwood of our Hanford Project Office at (509) 376-9529.

Sincerely,



Randall F. Smith, Director  
Environmental Cleanup Office