

September 6, 2002

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Tom Fitzsimmons, Director
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John Iani, Regional Administrator
U.S. Environmental Protection Agency, Region 10
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Subject: Exposure Scenarios Task Force on the River Corridor

Dear Msrs. Klein, Schepens, Fitzsimmons, and Iani,

The Hanford Advisory Board (Board) Exposure Scenarios Task Force met in June and July of this year to provide the Tri-Party Agreement (TPA) agencies with input on risk assessment and exposure scenarios for the river corridor portion of the Hanford Site. At the agencies' request, Board members of the Task Force also agreed to provide Board advice on these subjects for the river corridor.

The Task Force discussions on the river corridor and the central plateau were very rich and broad. Many interesting and innovative ideas and values concerning risk assessment, long term stewardship, exposure scenario development and cleanup in general were expressed. This advice represents only a small fraction of those ideas. The Board advises the Tri-Party agencies to review in depth the final Task Force report when it becomes available and use its input routinely when making decisions

concerning risk assessment and exposure scenario development which will not only affect us, but also generations yet to be born.

Consistent with its previous advice on risk assessment and exposure scenarios, the Board recommends that a spectrum of analyses and scenarios be run to include Tribal use, recreational and rural residential uses in the river corridor. The agencies should consider tribal and recreational use scenarios for all lands within at least one-quarter mile from the river shoreline. In the upland areas of the river corridor, tribal, recreational and rural residential scenarios should be used. Results of risk analyses and exposure scenarios need to be communicated with the public prior to making any decisions based on these efforts, in order to allow the public to provide its input to these decisions. The TPA Agencies should conduct public involvement activities early and often throughout the risk assessment and exposure scenario process.

Groundwater in the river corridor should be remediated to meet drinking water and ambient water quality standards by the time Department of Energy (DOE) petitions the Environmental Protection Agency to remove the river corridor from the National Priorities List (see Board Advice #125). Remediation of river corridor groundwater should consider the possibility of preferred groundwater pathways, and take into account the arrival of up-gradient Hanford contaminants. Actions must be taken to ensure that the arrival of these Hanford contaminants does not again cause the river corridor groundwater to exceed drinking water and ambient water quality standards. The Board also advises DOE to take action now to protect people and wildlife from contaminated seeps.

As part of its Performance Management Plan, DOE has identified a strategy to accelerate cleanup and protection of Hanford groundwater. The Board is concerned the strategic initiative for groundwater was added to the Performance Management Plan after preliminary funding decisions had likely already been made. Accelerating cleanup and protection of Hanford groundwater is a long-standing priority for the Board. The Board strongly encourages DOE – as it makes funding allocations for Fiscal year 2003 activities – to fully fund this initiative.

When developing criteria and end-states, the Board advises the TPA agencies to use a holistic approach and look at the effects of other site activities and conditions on a given waste site or project. Further, the Board advises the TPA agencies that in developing analysis goals, Tribal input parameters should be used, along with other public values and regulatory requirements. Also, ecological parameters obtained from the study of appropriate indicator populations should be factored into analysis goals. The river shoreline should be considered to include the river bank, the riparian zone, seeps, the river bed and islands.

Sincerely,

Todd Martin, Chair
Hanford Advisory Board

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.

cc: Wade Ballard, Deputy Designated Federal Official, U.S. Department of Energy
Jessie H. Roberson, Assistant Secretary, Environmental Management EM-1
Michael Gearheard, Environmental Protection Agency
Michael Wilson, Washington State Department of Ecology
Martha Crosland, U.S. Department of Energy Headquarters
Greg Hughes, U.S Fish & Wildlife
Jim Watts, Chair, Hanford Reach National Monument Federal Planning Advisory Committee
The Oregon and Washington Congressional Delegations