

HANFORD ADVISORY BOARD

A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act

Advising:

US Dept of Energy
US Environmental
Protection Agency
Washington State Dept
of Ecology

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June 17, 2005

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Washington State Department of Ecology

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Re: Integrated Disposal Facility Permit

Dear Messrs. Klein, Schepens, Kreizenbeck, & Manning,

The development process for the Integrated Disposal Facility (IDF) permit has demonstrated two positive characteristics of Hanford cleanup: (1) agency cooperation despite significant and potentially diversionary differences, and (2) responsiveness to Hanford Advisory Board (Board) input.

The Board congratulates the Department of Energy (DOE) and the Washington State Department of Ecology (Ecology) on their collaboration in developing the IDF permit limited to bulk vitrification, immobilized low activity waste (ILAW) and IDF-generated waste. Further, the Board thanks the agencies for revising and reissuing the permit application in response to Board concerns regarding the initial size and scope of the facility.

However, the Board remains concerned with the potential for expansion of the IDF without sufficient analysis. In Advice #153, "Need for Site-wide Cumulative Impact Analysis Relative to Hanford Solid Waste Environmental Impact Statement (HSW-EIS)," the Board advised,

HAB Consensus Advice #175
Subject: Integrated Disposal Facility Permit
Adopted: June 17, 2005
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"... the Department of Energy not proceed with the proposed decision to add the offsite wastes considered in the draft HSW-EIS to the Hanford site's soil until an analysis has been conducted assessing the cumulative impacts of adding the waste to waste already disposed on site. Only if we understand the cumulative risks from Hanford's waste can we consider whether adding more waste creates unacceptable risks and impacts."

This is one example of the Board's long-standing concern that a comprehensive Hanford cleanup requires comprehensive analysis of all the risks posed by waste disposal on site. Therefore, the Board advises that subsequent IDF permit modifications include cumulative risk analyses of all wastes previously disposed in IDF in addition to all wastes proposed for disposal in IDF in the permit modification. These analyses should comply with all environmental laws and regulations and include sound public involvement processes.

Advice

1. The IDF permit should be modified to ensure subsequent permit modifications require cumulative risk analysis of all wastes previously disposed in the IDF in addition to those proposed in future IDF Permit modifications.
2. Per the Board's prior advice, the Tri-Party Agreement should require cumulative risk analyses of all wastes disposed at Hanford.

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: Howard Gnann, Deputy Designated Federal Official, U.S. Department of Energy
Nick Ceto, Environmental Protection Agency
Michael Wilson, Washington State Department of Ecology

Melissa Nielson, U.S. Department of Energy Headquarters
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