Tri-Party Agreement

03-HAB-0014

MAY 22 2003

Mr. Todd Martin, Chair
Hanford Advisory Board
1933 Jadwin Avenue, Suite 135
Richland, Washington 99352

Dear Mr. Martin:

HANFORD ADVISORY BOARD (HAB) LETTER DATED APRIL 4, 2003
"GROUNDWATER STRATEGY AND GROUNDWATER PROTECTION"

This is in response to HAB Consensus Advice #145 on the "Groundwater Protection Strategy" developed jointly by The U.S. Department of Energy, Washington State Department of Ecology and the U.S. Environmental Protection Agency (otherwise known as the Tri-Parties).

The Tri-Parties appreciate the effort the Board has made to provide us with comments on the "Groundwater Protection Strategy." Your comments, combined with input we receive from Tribal Nations and interested citizens will help us complete the effort to frame our strategy for cleanup and protection of groundwater. As stated in the document, the goal in our plans, strategies and actions is to do no further harm and to clean up groundwater to its highest beneficial use.

The Tri-Parties recognize the importance of the issue raised in your advice and that actions are underway to address those (e.g. Milestone-24 rolling 3 year planning for new wells, characterization/corrective action through permit processes and interim actions, well decommissioning for high risk wells, five year. Record of Decision review improvements Science and Technology (S&T) Environmental Management Science Program work etc.)

Below is our response to your five specific comments.

- **Ensure significant groundwater technology development and implementation at Hanford is funded to meet the highest beneficial use groundwater cleanup goal.**

Response: We agree development and implementation of technologies will be a key to our success in addressing groundwater cleanup at Hanford. The Hanford Project Management Plan Groundwater Strategy Section 5.1.1 affirms our support for science and technology development. The Groundwater Protection Program has had and will continue to have a significant investment in groundwater technology development through both the programmatic S&T tasks in the U.S.

Department of Energy, Richland Operations Office's (RL), Baseline and by leveraging additional EM-50 and other technology deployment funding.

- **The strategy should include vadose zone monitoring as well as groundwater monitoring to provide early detection of contamination.**

Response: The strategy includes consideration of both vadose zone and groundwater monitoring to provide early detection of contamination. We will consider Vadose zone monitoring when we believe it is the best or most appropriate way to obtain data necessary for cleanup or to achieve the objectives of the groundwater strategy.

- **The strategy should include a specific standard of contamination that is a trigger for action when detected.**

Response: The Tri-Parties considered trigger levels in developing the strategy. The current approach in the plan is to evaluate the "trigger level" on a location and contaminant- specific basis. The decision to trigger an action is much more complex than simply a "specific standard of contamination." Rather the strategy establishes a series of considerations that include the source inventory, identity of the constituent, how the constituent relates to what's already in the underlying plume and what any planned remedy might focus on.

- **The groundwater strategy and implementation plan should include a strategy for accelerated remediation of 618-10 and -11 burial grounds in order to achieve the goal of cleaning groundwater to its highest beneficial use.**

Response: Remediation of the 618-10 and -11 burial grounds is part of the baseline to be completed by 2018. We are evaluating the strategy for acceleration of the effort and seeking additional funding from EM-50 to accelerate the development and testing of retrieval technologies for 618-10 and -11.

- **The groundwater strategy should incorporate the Board's prior advice that cleanup of groundwater to unrestricted use standards for each area along the Columbia river begin within one year of completion of that area's soil cleanup, and be complete by 2018.**

Response: Cleanup of groundwater is already underway in each area along the Columbia River. Several of the areas are reaching the cleanup obligations stated in the record of decision. We expect that the chromium plume areas will reach unrestricted use standards between 2006 and 2012. We are accelerating cleanup of all the groundwater plumes along the river and we will follow the appropriate regulatory processes for groundwater remediation.

The Tri-Parties agree with the Board's final comment that groundwater and source term remediation integration are key to achieving cleanup of groundwater.

We reiterate our appreciation for your comments on the strategy document. If you need further information or assistance, please contact the RL, Public Involvement Manager, Yvonne Sherman on (509) 376-6216.

Keith A. Klein, Manager
U.S. Department of Energy
Richland Operations Office

Roy J. Schepens, Manager
U.S. Department of Energy
Office of River Protection

Nicholas Ceto, Program Manager
Hanford Project Office
U.S. Environmental Protection Agency

Michael A. Wilson, Program Manager
State of Washington
Department of Ecology

COM: YTS

cc: see page 4

cc: N. Ceto, EPA
S. Waisley, EM-11
T. C. Fitzsimmons, Ecology
M. F. Gearheard, EPA
L. J. Iani, EPA
P. Mabie, EnviroIssues
M. A. Wilson, Ecology

U.S. Senators (WA)
Maria Cantwell
Patty Murray

State Senators (WA)
Pat Hale
Mike Hewitt

U.S. Representative (WA)
Brian Baird
Norm Dicks
Jennifer Dunn
Jay Inslee
Doc Hastings
Rick Larsen
Jim McDermott
George Nethercutt
Adam Smith

State Representatives (WA)
Jerome Delvin
Shirley Hankins

U.S. Senators (OR)
Gordon H. Smith
Ron Wyden

State Senators (OR)
Tony Corcoran
Mae Yih

U.S. Representatives (OR)
Earl Blumenauer
Peter DeFazio
Darlene Hooley
Greg Walden
David Wu