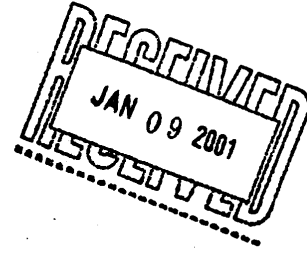




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

January 4, 2001



Merilyn Reeves, Chair
Hanford Advisory Board
1933 Jadwin, Suite 135
Richland, Washington 99352

Re: EPA Response to Consensus Advice #113, Hanford 2012

Dear Ms. Reeves:

The U.S. Environmental Protection Agency (EPA) has reviewed your advice regarding the U.S. Department of Energy Richland Operations Office (DOE-RL) proposal entitled "Hanford 2012: Accelerating Cleanup and Shrinking the Site." EPA commends the Board for their in-depth review of the proposal and detailed advice.

One of the points raised in your advice is a vision to achieve unrestricted use along the River Corridor. This a value that was first articulated in 1992 by the Hanford Future Site Uses Working Group which put forward a single unrestricted cleanup scenario for the Columbia River. The Working Group defined this area to include the river, the riparian zone, and the islands. EPA supports the vision set forth by the Working Group for the Columbia River.

Since 1992, EPA has used the recommendations of the Working Group in our cleanup decisions. Cleanup of the 100 Area in the Working Group report was termed "Reactors on the River" and described three cleanup options for the area. The Tri-Parties are in the process of implementing Cleanup Scenario C, which specifies the removal of all reactors and contaminated structures in the 200 Area, except for the B Reactor which would remain in place. The report goes on to say that except for the B Reactor itself, the surface, subsurface and groundwater would be cleaned up to an unrestricted status. The B Reactor would be restricted. The Tri-Parties have adopted a rural residential cleanup scenario to uphold the vision set forth by the Working Group.

The 300 Area, which encompasses the other portion of the River Corridor, was described by the Working Group as "All Other Areas." For the 300 Area, two cleanup scenarios were described. In both scenarios the recommendation was to clean the areas to a restricted status that would allow for industrial or wildlife uses. For those areas outside the 300 Area, the Working Group recommended the areas be cleaned up to unrestricted status. The Tri-Parties intend to clean up the waste sites in both the 300-FF-1 and 300-FF-2 Operable Units to an industrial use scenario. The cleanup scenario for the 300 Area will also provide for protection of wildlife, groundwater, and the Columbia River. Regarding the 618-10 and 618-11 Burial Grounds located in the 300-FF-2 Operable Unit, EPA will establish the appropriate milestones to assure these burial grounds are cleaned up in a timely manner with a goal of no later than 2018.

EPA shares the Board's vision to fully clean up groundwater threats to the River by 2018. In our opinion, DOE will need to invest more in the groundwater cleanup program to develop the needed technology to achieve this goal.

The Board reminds the agencies to be accurate in discussing expectations for the accomplishments that are realistic for the plan. EPA agrees with this cautionary note, and we recognize that if we are to implement this plan, tradeoffs will need to be made regarding cleanup of 200 Area waste sites, and this information will need to be communicated to all.

Although the subject of deletions from the National Priority List (NPL) is not in the Board's advice, the subject was discussed at both workshops held on the 2012 concept. I want to take this opportunity to share EPA's thoughts regarding deletions at Hanford. In a 1995 policy our agency recognized that for many Superfund sites cleanup could take many years to complete while portions of a site may have been cleaned up for productive uses. Therefore, EPA changed the deletion process to allow for partial deletion of an NPL site.

EPA has currently deleted two areas at Hanford -- a full deletion of the 1100 Area and a partial deletion in the 100 Area. The partial deletion was for the Wahluke Slope. EPA will use the flexibility built into our deletion policy to support the River Corridor Project.

EPA appreciates the Board's reminder to DOE to follow the change request process outlined in the TPA before making fundamental changes to their baseline. The TPA is the enforceable foundation for the Hanford cleanup. Over the next several months, EPA staff will be meeting with DOE to begin exploring required changes to the TPA to carry forth the vision outlined in DOE's 2012 plan. If draft change packages are developed, a public comment period will be held in late spring or early summer. We look forward to further discussions regarding the 2012 plan.

Sincerely,



Michael F. Gearheard, Director
Environmental Cleanup Office