

HANFORD ADVISORY BOARD

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US Environmental
Protection Agency
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of Ecology

September 7, 2007

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Dave Brockman, Manager

U.S. Department of Energy, Richland Operations
P.O. Box 550 (A7-50)
Richland, WA 99352

Re: Comments on the Draft Risk Assessment Report for the 100 Area and 300 Area Component of the River Corridor Baseline Risk Assessment (RCBRA) (DOE/RL-2007-21, Draft A)

Dear Mr. Brockman,

Background

This report is intended to be the foundation for developing the final Record of Decision (ROD) for the River Corridor Cleanup, and as such needs to comprehensively assess risk along the River Corridor. The risk assessment needs to be understandable by the tribes, stakeholders, technical experts and the public at large. An initial review of the document has resulted in a set of preliminary concerns set forth in the following comments, given below. Other concerns may subsequently arise from individual members of the Hanford Advisory Board.

Initial Comments

- This is neither a comprehensive, cumulative, or a baseline risk assessment. In fact, this is a very limited risk assessment relating to surface use of remediated waste sites. We strongly urge the U.S. Department of Energy (DOE) to significantly revise this document to ensure that it comprehensively assesses all risks along the River Corridor.
- The risk assessment needs a discussion of the significance of each set of cancer risk numbers, including how they compare to the standards of the State of Washington Model Toxics Control Act (MTCA), which are to be met by any cleanup decision in regard to the risk from residual contamination. It should provide an understanding of the degree of risk to specific populations (e.g., children) created by the rural residential, Native American, and industrial use scenarios.

Hanford Advisory Board

Subject: Comments of the Draft Risk Assessment Report for the 100 Area & 300 Area
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- The level of characterization of Hanford waste sites is still incomplete for a meaningful risk assessment on waste sites located in the 100 Area and 300 Area.
- The report summary and body should clearly reflect that ecological risks were assessed for remediated sites, not for those sites yet to be remediated or from projecting the future spread of contamination. The report should address the cumulative ecological risks from current or projected contamination, and the impacts to natural resources on future public use or Treaty rights.
- The report should clearly state whether this assessment will be used to support the final ROD for closure of cleanup efforts in the River Corridor.
- The risk assessment for the 100 Area and 300 Area River Corridor Baseline should include potential failure from actions taken to date.
- The risk assessment should provide adequate information to develop final RODs to cleanup groundwater contamination and protect the Columbia River. It is likely that some plumes and contamination will remain and that institutional controls will be necessary to protect the public from harm. The risks and lifecycle costs of long term stewardship and institutional controls should be incorporated into this assessment.
- It is essential that the principal findings, conclusions, and proposed actions of the risk assessment be clearly and transparently presented in the Executive Summary of the report. Stakeholders and the public should be able to determine from reading only the Executive Summary whether those findings, conclusions and recommendations are suitable and sensible without having to wade through every page and all the details of the analyses.

Sincerely,



Susan Leckband, Chair
Hanford Advisory Board

This letter represents HAB consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: Shirley Olinger, Acting Manager, U.S. Department of Energy, Office of
River Protection
Nick Ceto, U.S. Environmental Protection Agency
Jane Hedges, Washington State Department of Ecology
Doug Frost, U.S. Department of Energy Headquarters
The Oregon and Washington Congressional Delegations