

HANFORD ADVISORY BOARD

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

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US Environmental
Protection Agency
Washington State
Dept of Ecology

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Re: Draft Hanford Site Third CERCLA Five Year Review Report

Dear Messrs. McCormick and Faulk and Ms Hedges,

Background

The Hanford Advisory Board (Board) thanks the U.S. Department of Energy (DOE) for the opportunity to comment on the *Draft Hanford Site Third CERCLA Five-Year Review Report* (Third Report). The Third Report covers the five year period ending September 30, 2010. The Board found that many of the same problems in the *Hanford Site Second CERCLA Five-Year Review Report* (Second Report) published in 2006 were carried over to the Third Report.

The Board issued Advice #190 for the Second Report on June 2, 2006. The Board advised DOE to base protectiveness of current remedial actions on factors such as sampling to see if contamination has spread. The Board also requested that the U.S. Environmental Protection Agency (EPA) determine whether cleanup remedies are, in fact, protective of human health and the environment. EPA's response to this advice on July 27, 2006 avoided discussion of verifying the protectiveness of cleanup remedies.

HAB Consensus Advice # 249

Subject: Draft Hanford Site Third CEECLA Five Year Review Report

Adopted: September 9, 2011

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It is the Board's opinion that the most important aspect of the CERCLA Five-Year Review process is to assess whether the remedies that have been selected are effectively preventing the spread of radioactive and chemical contamination. The Third Report does not adequately meet this expectation. Among other deficiencies, the Board believes that the Third Report has an overreliance on institutional controls as an indicator of protectiveness.

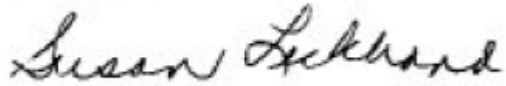
The history of Hanford has shown that the vagaries of nature and errors of human implementation provide the possibility for movement of contamination. The Board believes that the only way to determine the long-term protectiveness of a remedy is through periodic physical monitoring/sampling.

The Board believes that protectiveness of all chosen remedies must be demonstrated using periodic measurements to ensure that residual radioactive and chemical contamination is behaving as predicted.

Advice

- The Board advises DOE to thoroughly evaluate whether all chosen remedies are effective, and are protective of human health and the environment.
- The Board advises DOE to clearly articulate the methodology it used to reach its protectiveness determinations. This should include information used to support its conclusions, such as soil and groundwater monitoring and sampling data, by location, for each operable unit.
- The Board advises DOE and regulators to agree on additional sampling needed to evaluate protectiveness, and to include the results in the Five-Year Review report.
- The Board advises DOE that, as cleanup progresses, members of the public may rely on the Five-Year Review reports to determine whether cleanup is effectively protecting human health and the environment. It is important that the Third report and future Five-Year Review reports clearly demonstrate the ongoing effectiveness of all remedial actions.
- The Board incorporates by reference the values and recommendations regarding institutional controls and inclusion of new information articulated in Advice #190, and advises DOE not to rely on institutional controls to determine long term protectiveness of a performed remediation action.

Sincerely,



Susan Leckband, Chair
Hanford Advisory Board

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

cc: Scott Samuelson, Manager, U. S. Department of Energy, Office of River Protection
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