



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
HANFORD/INL PROJECT OFFICE  
309 Bradley Boulevard, Suite 115  
Richland, Washington 99352

April 5, 2012

Ms. Susan Leckband  
Chair  
Hanford Advisory Board  
713 Jadwin, Suite 4  
Richland, Washington 99352

Re: Response to Hanford Advisory Board Consensus Advice #253

Dear ~~Ms. Leckband~~: *SUSAN*

The U.S. Environmental Protection Agency would like to thank the Board for their advice on the 100-K Proposed Plan (Draft A). The EPA provided comments to the U.S. Department of Energy regarding the 100-K Remedial Investigation/Feasibility Study and Proposed Plan on November 14, 2011. These comments are in the Administrative Record (Accession Number 1111180752), and several of the HAB's advice points are included in our comments. Our letter to the DOE states that the list of contaminants of concern for the K Area should be expanded, and the selected remedy for the majority of waste sites should be remove, treat, and dispose. Specific comments attached to our letter state that the proposed remedy and rationale for the remedy need to be identified for each waste site with deep contamination in the FS and PP.

The National Oil and Hazardous Substances Pollution Contingency Plan calls for a site-specific baseline risk assessment to be conducted as part of the RI/FS process. Although the RI/FS process and related risk information activities are typically presented in a fashion that makes the steps appear sequential and distinct, in practice the process is highly iterative. The River Corridor Baseline Risk Assessment and other risk assessments that have been performed at Hanford provide important data to be used in the K Area and other site-specific RI/FS documents. EPA and DOE intend to use the data in the risk assessments for cleanup actions along the river corridor. The site-specific RI/FS documents for a set of operable units contain all of the information necessary to evaluate risk and determine a need for action.

In the Draft PP, the DOE recommended Alternative 2—RTD and Groundwater Pump-and-Treat Optimized with Other Technologies—as the preferred alternative. The DOE believed that Alternative 2 met the threshold criteria and provided the best balance of tradeoffs when compared with Alternative 3 with respect to the balancing and modifying criteria. However, the EPA did not completely support the soil flushing with bioinfiltration aspect of this Alternative. Therefore, based on information currently available, the EPA's preferred alternative is Alternative 3—RTD and Expanded Groundwater Treatment. We expressed this concern to the DOE in a meeting with the Tri-Parties on March 6, 2012, and they agreed that the revised PP will select Alternative 3 as the preferred alternative.

All of the groundwater COCs will be addressed with the expanded pump-and-treat system in Alternative 3. The entirety of the contaminant plumes will also be addressed by the remedy, including the plumes

that may not fall within the operable unit boundary shown on the map, or that are migrating into the N Area.

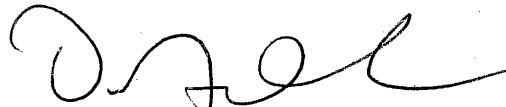
To ensure that the site-wide orchard impacted lands are adequately addressed, the Tri-Parties have agreed to place them in their own operable unit (100-OL-1), as described in TPA Change Package C-12-01, *Addition of the 100-OL-1 Operable Unit to the Tri-Party Agreement (TPA) Appendix C*. Like many of the operable units in Appendix C of the TPA, this new operable unit will be carried through the CERCLA process.

The Tri-Party agencies are planning to hold informational meetings on the upcoming proposed cleanup plans for areas along the Columbia River. These meetings would provide information on the six areas in the River Corridor (including risk assessment) and help participants understand the big picture for cleanup along the river. While these meetings will be a useful tool, they are not intended to replace public meetings associated with CERCLA proposed plans. The Tri-Party agencies are also considering using other tools such as webinars, fact sheets and videos to communicate with the public on the upcoming proposed plans.

Any use of institutional controls as part of the selected remedy will be clearly described in the ROD as is required under CERCLA.

Thank you for your time in reviewing the 100-K Proposed Plan (Draft A).

Sincerely,

A handwritten signature in black ink, appearing to read 'Dennis Faulk', written in a cursive style.

Dennis Faulk  
Program Manager

cc: Jane Hedges, Ecology  
Tiffany Nguyen, DOE