

HANFORD ADVISORY BOARD

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

Advising:

US Dept of Energy
US Environmental
Protection Agency
Washington State Dept
of Ecology

June 8, 2007

Mike Weis, Acting Manager
U.S. Department of Energy, Richland Operations
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Susan Leckband

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Shirley Olinger, Acting Manager
U.S. Department of Energy, Office of River Protection
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Elin D. Miller, Regional Administrator
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, WA 98101

Jay Manning, Director
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: Groundwater Values

Dear Messrs. Weis, Manning and Ms. Miller and Ms. Olinger,

The Washington Legislature passed the Water Resources Act of 1971 to protect and manage the State's water resource for "the greater benefit of the people." This act mandates water resource data collection and development and management of comprehensive water resource plans. Groundwater is an essential resource, owned by the people of the State of Washington. Groundwater flowing beneath land owned by the United States does not make groundwater the property of the United States nor in any way diminish its value to the people of Washington.

The Columbia River is a lifeline for the economies of Washington and Oregon as well as important to Native American cultural values and land use. The Hanford Advisory Board (Board) is very concerned about the potential for additional radiological and chemical contamination from the Hanford Reservation that has reached the groundwater to enter the Columbia River. As the Board has said

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HAB Consensus Advice #197
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repeatedly, it is essential that all groundwater laws are adhered to and all related policies and activities are integrated to protect the Columbia River.

The Board advises the Tri-Party Agencies to set specific goals and schedules for the characterization, remediation, and cleanup of all contaminated groundwater under the Hanford site. These schedules should extend as long as needed to ensure that risk to human health and the ecosystem from groundwater contamination is minimized to the greatest extent practicable. The long term goal of the groundwater program is to return all groundwater to its highest beneficial use. Highest beneficial use is protective of all human health, ecosystems, and Native American treaty rights.

The Board advises fully funded, coordinated integration of all efforts to address remediation of groundwater and vadose zone contamination plumes. Additionally, the Board advises funding to support development of new technologies to address groundwater remediation. All contaminated groundwater plumes should be characterized to determine the volume, chemical gradient, velocity and movement direction. In addition, the Board feels there should be a contaminated plume registry to meet the essential need that the public be able to track all plumes to their source. This registry should include offsite plumes that have migrated under the Hanford Nuclear Reservation.

The Hanford Advisory Board has established values for groundwater remediation decision-making based on past advice and years of oversight of the program. The attached decision flow chart illustrates those values and the process for ensuring they are considered as important decisions are made.

Sincerely,



Susan Leckband, Chair
Hanford Advisory Board

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

cc: Dave Brockman, Co-Deputy Designated Federal Official, U.S. Department of Energy, Richland Operations Office
Nick Ceto, Environmental Protection Agency
Jane Hedges, Washington State Department of Ecology
Doug Frost, U.S. Department of Energy Headquarters
The Oregon and Washington Congressional Delegations

Values

- Groundwater is to be cleaned up and restored to the highest beneficial use.*
- Restoration should be within a reasonable time frame, commensurate with risk and Tri-Party Agreement timelines.
- Ongoing groundwater remediation activities and review processes should be fully funded.
- Technology development should continually be pursued to remediate and restore groundwater to highest beneficial use.*
- The public and tribes must have input to the remedy selection for groundwater, including the relevant timelines for remediation, and determination of the risk from foreseeable failures of institutional controls.
- Institutional controls are not an acceptable solution for contaminated plumes with the potential for migration.
- Remove, treat and dispose is the preferred action; natural attenuation as a remedy is not appropriate unless existing remedies are not technically practicable and relevant health and environment standards can be achieved in a reasonable time frame.
- The HAB expects DOE and its federal successors to retain control over long term stewardship and institutional controls of groundwater. This expectation should ensure that active measures to monitor and evaluate groundwater remediation will continue until it no longer poses a risk to human health and the environment.

* Highest beneficial use is protective of all human health, ecosystems and Native American treaty rights.

Hanford Advisory Board — Groundwater Values Flowchart

