

February 8, 2002

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John Iani, Regional Administrator  
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Tom Fitzsimmons, Director  
Washington State Department of Ecology  
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Re: 100/300 Area Change Package

Dear Messrs. Klein, Iani, and Fitzsimmons

The Hanford Advisory Board applauds the Tri-Party agencies for reaching agreement on a proposed set of River Corridor milestones. These milestones outline steps toward completing this important portion of Hanford cleanup and protecting the Columbia River.

The Board also commends the agencies on characteristics of this change package that indicate a well-thought out plan. The agencies pursued a streamlined approach that minimized the number of milestones necessary to successfully regulate cleanup.

While the Board supports the development of enforceable milestones aimed at river corridor cleanup, this support is tempered by the following concerns and recommendations:

### **Groundwater**

Groundwater remains of foremost concern to the Board. The Board encourages the agencies to maintain ongoing successful groundwater remediation actions and pursue more aggressive technology development and treatment activities.

Currently, the change package would establish milestones that require initiation of groundwater restoration activities only after all 100 Area soil removal actions are complete. The Board recommends that actions be expedited by initiating groundwater actions in each remedial unit upon completion of soil removal in that unit.

The parties must examine existing and proposed off-site projects that may impact groundwater flow and contaminant spread.

### **Disposition of 300 Area Buildings and waste sites.**

The Board is concerned about the cleanup and use of the entire 300 Area. Currently, the change package does not address all of the buildings in the 300 Area. However, with many other buildings and waste sites in the 300 Area, the potential for risks to workers, the public, and the environment exists.

Further, the existing lack of information concerning risks posed by 300 Area facilities prevents the Board from accurately prioritizing to the milestone activities outlined in the change package. In other words, the approach outlined below is important in developing a basis from which to assess the relative importance of specific 300 Area building remediation projects. This capability will be very important in any funding scenario below full TPA compliance.

To address the two above concerns and ensure the 300 Area cleanup is approached in a comprehensive, common-sense manner, the Board recommends:

- DOE identify the status, mission and funding source (e.g. Environmental Management, Office of Science and Technology, etc.) for all 300 Area buildings.
- Ensure the programmatic ‘owner’ is indeed funding each of its facilities.
- Determine the status and disposition of facilities based on a comprehensive set of criteria that has been developed with public input. Examples of criteria include risks to workers, the public, and the environment; impacts on surrounding cleanup activities; safety requirements of facilities; and building requirements for safety buffers.

The goal of these recommendations is to ensure that the breadth of 300 Area activities—from research to cleanup—are conducted safely and efficiently.

The Board also recommends DOE’s approach to cleanup priorities in the 300 Area be based on risks to workers, the public and the environment with appropriate consideration to infrastructure and mortgage reduction issues.

Consistent with past Board advice, the cleanup goal “outside the 300 Area fence” should be unrestricted use.

### **TPA alignment with River Corridor Contract**

The Board reiterates its expectation (see Advice #123) that the River Corridor Contract requirements will be consistent with the milestones resulting from this change package process. If the TPA and the River Corridor Contract are not aligned, it is the Board’s expectation that the contract will be modified to ensure compliance with the TPA.

### **Remote Handled Transuranic Waste (RH TRU) Capability**

The Board recognizes the important relationship between completion of M-91 activities (RH TRU handling capability in the Central Plateau) and remediation of burial grounds 618-10 and 11. Without adequate funding for M-91, DOE will not have the capability to clean up 618-10 and 11 burial grounds. Remediation of these two burial grounds has been, and remains, a critical part of Hanford cleanup. The Board recommends that M-19 be adequately funded in order for DOE to ensure capability of clean up of the 618-10 and 11 burial grounds.

Sincerely,

Todd Martin, Chair  
Hanford Advisory Board

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*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: Harry Boston, Manager, U.S. Department of Energy, Office of River Protection  
Wade Ballard, Deputy Designated Federal Official, U.S. Department of Energy  
Michael Gearheard, Environmental Protection Agency  
Michael Wilson, Washington State Department of Ecology  
Martha Crosland, U.S. Department of Energy Headquarters  
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