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February 4, 2000

Chuck Clarke, Regional Administrator  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue  
Seattle, WA 98101

Tom Fitzsimmons, Director  
Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

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

Subject: Characterization of Burial Grounds and Importation of Waste

Dear Messrs. Clarke, Fitzsimmons, and Klein:

Historical records, process knowledge and documentation of burial, as late as 1995, indicate that the Hanford Site's low-level waste burial grounds contain mixed low-level waste, which contain "hazardous" or "dangerous" waste. If the burial grounds do contain hazardous waste, they do not have monitoring, leachate collection systems, and other environmental protection systems as required under state and federal laws for landfills in which dangerous or hazardous wastes have been disposed. The U. S. Department of Energy has no immediate plans to investigate or remediate potential contamination from these burial grounds, install monitoring, or create compliant disposal facilities.

The Hanford Advisory Board (Board) urges the Washington Department of Ecology and U.S. Environmental Protection Agency to require a determination if Hanford's low-level waste burial grounds contain mixed low-level hazardous or dangerous wastes. The Board recognizes that protection requirements for worker safety at the burial grounds must be based on what is actually buried. If it is determined that the low-level waste burial grounds contain mixed low-level waste, the regulators should use their existing legal authority to regulate the burial grounds appropriately. The Board urges no offsite wastes be disposed into the low-level waste burial grounds being investigated until the determination is made, and they are appropriately regulated. We look forward to your response and to periodic progress updates on this matter.

Very truly yours,

Merilyn B. Reeves, Chair  
Hanford Advisory Board

cc: Carolyn Huntoon, Department of Energy Headquarters  
Wade Ballard, Deputy Designated Federal Official  
The Oregon and Washington Congressional Delegations  
Michael Gearheard, Environmental Protection Agency  
Dan Silver, Washington Department of Ecology

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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.*

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*HAB Consensus Advice #103*

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*Adopted: February 4, 2000*