

HANFORD ADVISORY BOARD

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

Advising:

Nov. 7, 2003

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

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Re: Need for Site-wide Cumulative Impact Analysis Relative to Hanford Solid Waste EIS and Decisions to Add Waste from Offsite

Dear Mssrs. Klein, Schepens, Iani, and Ms. Hoffman,

In response to Hanford Advisory Board (Board) advice on the draft Hanford Solid Waste Environmental Impact Statement (HSW-EIS), the Environmental Protection Agency (EPA) stated that a site-wide cumulative impact analysis can be initiated by 2008 (when Comprehensive Environmental Response, Compensation, and Liability Act and Resource Conservation Recovery Act facility investigations are complete pursuant to M-15 and M-45 milestones). The Board urges the Tri-Party Agreement include a milestone to ensure this site-wide cumulative impact analysis occurs.

The Board advises the Department of Energy not proceed with the proposed decision to add the offsite wastes considered in the draft HSW-EIS to the Hanford site's soil until an analysis has been conducted assessing the cumulative impacts of adding the waste to waste already disposed on site. Only if we understand the cumulative risk from Hanford's waste can we consider whether adding more waste

HAB Consensus Advice #153

Subject: Need for Site-wide Cumulative Impact Analysis Relative to Hanford Solid Waste EIS and Decisions to Add Waste from Offsite

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creates unacceptable risks and impacts. EPA's response to Board advice regarding the draft HSW-EIS recognized the EIS does not provide this cumulative impact analysis.

Sincerely,



Todd Martin, 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: Jessie Roberson, Assistant Secretary of Energy, U.S. Department of Energy
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