



**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

04-AMCP-0101

FEB 26 2004

Mr. Todd Martin, Chair  
Hanford Advisory Board  
1933 Jadwin Avenue, Suite 135  
Richland, Washington 99352

Dear Mr. Martin:

**RESPONSE TO CONSENSUS ADVICE #153, NEED FOR SITE-WIDE CUMULATIVE IMPACT ANALYSIS AND RECEIPT OF OFFSITE WASTE**

The Hanford Advisory Board (HAB) recommended that offsite waste not be disposed of at Hanford until DOE completes a cumulative site-wide impact analysis. In addition, the HAB recommended the Tri-Parties create a milestone to ensure that analysis is completed.

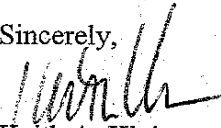
DOE is currently limiting receipt of low-level waste for disposal at Hanford to waste generated at the Site and waste from "existing" offsite (non-Hanford) generators. DOE is not currently accepting any mixed low-level waste from offsite DOE generators.

The potential incremental impacts of disposing waste from onsite and offsite generators at Hanford are presented in the Hanford Site Solid (Radioactive and Hazardous) Waste Program Environmental Impact Statement (HSW EIS). The HSW EIS evaluated a Hanford-only waste volume as well as Hanford waste plus offsite waste volumes represented by a lower bound waste volume and an upper bound waste volume for each of the action alternatives. The analyses presented in the revised HSW EIS indicate that there were only minimal differences in the impacts between the Hanford-only and upper bound waste volumes.

A cumulative site-wide analysis was performed as part of the HSW EIS consistent with National Environmental Policy Act requirements and the Council of Environmental Quality regulations. Public comments on the HSW EIS, including those relating to cumulative impacts, have been addressed as part of the HSW EIS. DOE has met applicable legal requirements and no new Tri-Party Agreement milestone is appropriate. DOE notes that the U.S. Environmental Protection Agency, in its response to the HAB dated January 28, 2004, also indicated that no new milestone is appropriate.

If you have questions, please contact me or Matthew McCormick, Office of the Assistant Manager for the Central Plateau, on (509) 376-6536.

Sincerely,

  
Keith A. Klein  
Manager

AMCP:MSC

cc: See Page 2

Mr. Todd Martin  
04-AMCP-0101

-2-

cc: N. Ceto, EPA  
L. Hoffman, Ecology  
John Iani, EPA  
M. A. Wilson, Ecology

U.S. Senators (WA)

Maria Cantwell  
Patty Murray

U.S. Senators (OR)

Gordon H. Smith  
Ron Wyden

U.S. Representatives (WA)

Brian Baird  
Norm Dicks  
Jennifer Dunn  
Jay Inslee  
Richard Hastings  
Rick Larsen  
Jim McDermott  
George Nethercutt  
Adam Smith

U.S. Representatives (OR)

Earl Blumenauer  
Peter DeFazio  
Darlene Hooley  
Greg Walden  
David Wu

State Senators (WA)

Pat Hale  
Mike Hewitt

State Representatives (WA)

Jerome Delvin  
Shirley Hankins

E-STARS™ Report  
 Task Detail Report  
 02/26/2004 1022

TASK INFORMATION			
<b>Task#</b>	DOE-AMCP-C-2004-0101		
<b>Subject</b>	RESPONSE TO CONSENSUS ADVICE #153, NEED FOR SITE-WIDE CUMULATIVE IMPACT ANALYSIS AND RECEIPT OFFSITE WASTE		
<b>Parent Task#</b>		<b>Status</b>	Open
<b>Reference</b>		<b>Due</b>	02/23/2004
<b>Originator</b>	Castleberry, Connie J	<b>Priority</b>	None
<b>Originator Phone</b>	(509) 376-1366	<b>Category</b>	None
<b>Origination Date</b>	12/03/2003 1353	<b>Generic1</b>	
<b>Remote Task#</b>		<b>Generic2</b>	
<b>Deliverable</b>	None	<b>Generic3</b>	
<b>Class</b>	None	<b>View Permissions</b>	Normal
<b>Instructions</b>	<p>bcc:                      AMCP Off File                      AMCP Rdg File                      C. J. Castleberry, AMCP                      C. C. Clark, COM                      M. S. Collins, AMCP                      J. J. Fiore, EM-43                      K. M. Hintzen, AMCP                      M. S. McCormick, AMCP                      Y. T. Sherman, COM                      K. M. Thompson, AMCP</p> <p>RECORD NOTE: The HAB provided comments on the revised draft HSW EIS (HAB Consensus Advice #148). EPA responded to the HAB indicating differences in views regarding the "appropriate vehicle to conduct a site-wide analysis of cumulative impacts." Based on EPA's response, the HAB advised not "to add the offsite wastes considered in the draft HSW-EIS to the Hanford Site's soil" until after the CERCLA/RCRA investigations associated with the Tri-Party Agreement Milestones M-15 and M-45 are met (currently scheduled in 2008).</p> <p>Changes were made to the attached letter February 9, 2004, by Michael Collins and is being rerouted for your concurrence. Colleen Clark's, COM, and Bob Carosino's, OCC, comments were incorporated 02-23-04.</p>		
<b>ROUTING LISTS</b>			
1	Route List		Active
	<ul style="list-style-type: none"> <li>● Collins, Michael S - Approve - Approved - 12/03/2003 1518</li> <li>● Robertson, Owen C - Approve - Approved - 12/03/2003 1514</li> <li>● Thompson, Mike - Approve - Approved - 12/04/2003 0704</li> <li>● Morse, John G - Approve - Approved - 12/03/2003 1520</li> <li>● Hildebrand, R Doug - Approve - Approved - 12/03/2003 1428</li> <li>● Marvin, Marla K - Approve - Approved with comments - 12/17/2003 1501</li> <li>● Dunigan, Paul F - Approve - Approved with comments - 01/08/2004 1602</li> </ul>		

**RECEIVED**  
 FEB 26 2004  
 DOE-RL/RLCC

	<ul style="list-style-type: none"> <li>● Hollowell, Betty L - Approve - Approved with comments - 02/19/2004 1639</li> </ul>		
	<ul style="list-style-type: none"> <li>● Sherman, Yvonne T - Approve - Approved - 02/23/2004 1105</li> </ul>		
	<ul style="list-style-type: none"> <li>● Clark, Colleen C - Approve - Approved with comments - 02/23/2004 1105</li> </ul>		
	<ul style="list-style-type: none"> <li>● McCormick, Matthew S - Approve - Approved with comments - 02/23/2004 1410</li> </ul>		
	<ul style="list-style-type: none"> <li>● Weis, Michael J - Approve - Approved - 02/25/2004 0707</li> </ul>		
	<ul style="list-style-type: none"> <li>● Klein, Keith A - Approve - Approved - 02/26/2004 0801</li> </ul>		
2	Route List		Draft
No Assignees			
<b>ATTACHMENTS</b>			
Attachments	<ol style="list-style-type: none"> <li>1. 04-AMCP-0101 BACKGROUND.pdf</li> <li>2. 04-AMCP-0101msc.doc</li> </ol>		
<b>COMMENTS</b>			
<b>Poster</b>	Marvin, Marla K (Avery, Susan E) - 12/17/2003 0312		
	Approve		
	12/17/03 - Marla concurred w/corrections by hard copy. ~SEA		
<b>Poster</b>	Dunigan, Paul F (Dunigan, Paul F) - 01/08/2004 0401		
	Approve		
	<p>Approve with these changes:                  Paragraph 2, line 2: insert "potential impacts of" between "..the" and "actions...."                  Paragraph 2, line 3: insert "the impacts of" between "...in relation to" and "other", and insert "past, present and reasonably foreseeable" between "other" and "actions that may...."                  Paragraph 2, line 4: delete "typically".                  Paragraph 2, lines 8 and 9: replace "compared to the" with "considered together with"                  Paragraph 2, line 9: delete "cumulative site-wide".                  Paragraph 2, line 9: replace "Hanford activities as a whole" with "DOE and other activities in the Hanford area".</p> PFXDJr. 1/8/04		
<b>Poster</b>	Hollowell, Betty L (Dawson, Jodi L) - 02/19/2004 0402		
	Approve		
	Approval contingent on the incorporation of comments provided to C. Castleberry. These comments were worked on by Y. Sherman, M. Collins, B. Carosino and Betty Hollowell.		
<b>Poster</b>	Clark, Colleen C (Avery, Susan E) - 02/23/2004 1102		
	Approve		
	2/23/04 - Approve w/comments. ~SEA		
<b>Poster</b>	McCormick, Matthew S (Castleberry, Connie J) - 02/23/2004 0202		
	Approve		
	MATT MCCORMICK CONCURRED BY HARD COPY 02-24-04.		
<b>TASK DUE DATE HISTORY</b>			
<b>Modified</b>	01/05/2004 1104 - Castleberry, Connie J (Castleberry, Connie J)	<b>New Due Date</b>	01/08/2004 1700
<b>Modified</b>	02/10/2004 1508 - Castleberry, Connie J (Castleberry, Connie J)	<b>New Due Date</b>	02/20/2004 1700
<b>Modified</b>	02/23/2004 1124 - Castleberry, Connie J (Castleberry, Connie J)	<b>New Due Date</b>	02/23/2004 1700

<b>SUB TASK HISTORY</b>	
<b>Subtask#</b>	DOE-AMCP-C-2004-0101.1
<b>Subject</b>	RESPONSE TO CONSENSUS ADVICE #153, NEED FOR SITE-WIDE CUMULATIVE IMPACT ANALYSIS AND RECEIPT OFFSITE WASTE
<b>Originator</b>	Hollowell, Betty L
<b>Routing List</b>	<i>No Active Routing List</i>

-- end of report --

E-STARS™ Report  
 Task Detail Report  
 02/24/2004 0140

TASK INFORMATION			
<b>Task#</b>	DOE-AMCP-C-2004-0101		
<b>Subject</b>	RESPONSE TO CONSENSUS ADVICE #153, NEED FOR SITE-WIDE CUMULATIVE IMPACT ANALYSIS AND RECEIPT OFFSITE WASTE		
<b>Parent Task#</b>		<b>Status</b>	Open
<b>Reference</b>		<b>Due</b>	02/23/2004
<b>Originator</b>	Castleberry, Connie J	<b>Priority</b>	None
<b>Originator Phone</b>	(509) 376-1366	<b>Category</b>	None
<b>Origination Date</b>	12/03/2003 1353	<b>Generic1</b>	
<b>Remote Task#</b>		<b>Generic2</b>	
<b>Deliverable</b>	None	<b>Generic3</b>	
<b>Class</b>	None	<b>View Permissions</b>	Normal
<b>Instructions</b>	<p>bcc:                      AMCP Off File                      AMCP Rdg File                      C. J. Castleberry, AMCP                      C. C. Clark, COM                      M. S. Collins, AMCP                      J. J. Fiore, EM-43                      K. M. Hintzen, AMCP                      M. S. McCormick, AMCP                      Y. T. Sherman, COM                      K. M. Thompson, AMCP</p> <p>RECORD NOTE: The HAB provided comments on the revised draft HSW EIS (HAB Consensus Advice #148). EPA responded to the HAB indicating differences in views regarding the "appropriate vehicle to conduct a site-wide analysis of cumulative impacts." Based on EPA's response, the HAB advised not "to add the offsite wastes considered in the draft HSW-EIS to the Hanford Site's soil" until after the CERCLA/RCRA investigations associated with the Tri-Party Agreement Milestones M-15 and M-45 are met (currently scheduled in 2008).</p> <p>Changes were made to the attached letter February 9, 2004, by Michael Collins and is being rerouted for your concurrence. Colleen Clark's, COM, and Bob Carosino's, OCC, comments were incorporated 02-23-04.</p>		
ROUTING LISTS			
1	Route List		Active
	● Collins, Michael S - Approve - Approved - 12/03/2003 1518		
	● Robertson, Owen C - Approve - Approved - 12/03/2003 1514		
	● Thompson, Mike - Approve - Approved - 12/04/2003 0704		
	● Morse, John G - Approve - Approved - 12/03/2003 1520		
	● Hildebrand, R Doug - Approve - Approved - 12/03/2003 1428		
	● Marvin, Marla K - Approve - Approved with comments - 12/17/2003 1501		
	● Dunigan, Paul F - Approve - Approved with comments - 01/08/2004 1602		

	<ul style="list-style-type: none"> <li>Hollowell, Betty L - Approve - Approved with comments - 02/19/2004 1639</li> </ul>		
	<ul style="list-style-type: none"> <li>Sherman, Yvonne T - Approve - Approved - 02/23/2004 1105</li> </ul>		
	<ul style="list-style-type: none"> <li>Clark, Colleen C - Approve - Approved with comments - 02/23/2004 1105</li> </ul>		
	<ul style="list-style-type: none"> <li>McCormick, Matthew S - Approve - Approved with comments - 02/23/2004 1410</li> </ul>		
	<ul style="list-style-type: none"> <li>Weis, Michael J - Approve - Awaiting Response <i>MJW 2/24/04</i></li> </ul>		
	<ul style="list-style-type: none"> <li>Klein, Keith A - Approve - Awaiting Response</li> </ul>		
2	Route List <span style="float: right;">Draft</span>		
<i>No Assignees</i>			
<b>ATTACHMENTS</b>			
Attachments	<ol style="list-style-type: none"> <li>04-AMCP-0101 BACKGROUND.pdf</li> <li>04-AMCP-0101msc.doc</li> </ol>		
<b>COMMENTS</b>			
<b>Poster</b>	Marvin, Marla K (Avery, Susan E) - 12/17/2003 0312		
	Approve		
	12/17/03 - Marla concurred w/corrections by hard copy. ~SEA		
<b>Poster</b>	Dunigan, Paul F (Dunigan, Paul F) - 01/08/2004 0401		
	Approve		
	<p>Approve with these changes:                      Paragraph 2, line 2: insert "potential impacts of" between ".the" and "actions...."                      Paragraph 2, line 3: insert "the impacts of" between "...in relation to" and "other", and insert "past, present and reasonably foreseeable" between "other" and "actions that may...."                      Paragraph 2, line 4: delete "typically".                      Paragraph 2, lines 8 and 9: replace "compared to the" with "considered together with"                      Paragraph 2, line 9: delete "cumulative site-wide".                      Paragraph 2, line 9: replace "Hanford activities as a whole" with "DOE and other activities in the Hanford area".</p> <p>PFXDJr. 1/8/04</p>		
<b>Poster</b>	Hollowell, Betty L (Dawson, Jodi L) - 02/19/2004 0402		
	Approve		
	Approval contingent on the incorporation of comments provided to C. Castleberry. These comments were worked on by Y. Sherman, M. Collins, B. Carosino and Betty Hollowell.		
<b>Poster</b>	Clark, Colleen C (Avery, Susan E) - 02/23/2004 1102		
	Approve		
	2/23/04 - Approve w/comments. ~SEA		
<b>Poster</b>	McCormick, Matthew S (Castleberry, Connie J) - 02/23/2004 0202		
	Approve		
	MATT MCCORMICK CONCURRED BY HARD COPY 02-24-04.		
<b>TASK DUE DATE HISTORY</b>			
<b>Modified</b>	01/05/2004 1104 - Castleberry, Connie J (Castleberry, Connie J)	<b>New Due Date</b>	01/08/2004 1700
<b>Modified</b>	02/10/2004 1508 - Castleberry, Connie J (Castleberry, Connie J)	<b>New Due Date</b>	02/20/2004 1700
<b>Modified</b>	02/23/2004 1124 - Castleberry, Connie J (Castleberry, Connie J)	<b>New Due Date</b>	02/23/2004 1700

<b>SUB TASK HISTORY</b>	
<b>Subtask#</b>	DOE-AMCP-C-2004-0101.1
<b>Subject</b>	RESPONSE TO CONSENSUS ADVICE #153, NEED FOR SITE-WIDE CUMULATIVE IMPACT ANALYSIS AND RECEIPT OFFSITE WASTE
<b>Originator</b>	Hollowell, Betty L
<b>Routing List</b>	<i>No Active Routing List</i>

-- end of report --



E-STARS™ Report  
 Task Detail Report  
 02/23/2004 11:24

TASK INFORMATION			
<b>Task#</b>	DOE-AMCP-C-2004-0101		
<b>Subject</b>	RESPONSE TO CONSENSUS ADVICE #153, NEED FOR SITE-WIDE CUMULATIVE IMPACT ANALYSIS AND RECEIPT OFFSITE WASTE		
<b>Parent Task#</b>		<b>Status</b>	Open
<b>Reference</b>		<b>Due</b>	02/23/2004
<b>Originator</b>	Castleberry, Connie J	<b>Priority</b>	None
<b>Originator Phone</b>	(509) 376-1366	<b>Category</b>	None
<b>Origination Date</b>	12/03/2003 1353	<b>Generic1</b>	
<b>Remote Task#</b>		<b>Generic2</b>	
<b>Deliverable</b>	None	<b>Generic3</b>	
<b>Class</b>	None	<b>View Permissions</b>	Normal
<b>Instructions</b>	<p>bcc:                      AMCP Off File                      AMCP Rdg File                      C. J. Castleberry, AMCP                      C. C. Clark, COM                      M. S. Collins, AMCP                      J. J. Fiore, EM-43                      K. M. Hintzen, AMCP                      M. S. McCormick, AMCP                      Y. T. Sherman, COM                      K. M. Thompson, AMCP</p> <p>RECORD NOTE: The HAB provided comments on the revised draft HSW EIS (HAB Consensus Advice #148). EPA responded to the HAB indicating differences in views regarding the "appropriate vehicle to conduct a site-wide analysis of cumulative impacts." Based on EPA's response, the HAB advised not "to add the offsite wastes considered in the draft HSW-EIS to the Hanford Site's soil" until after the CERCLA/RCRA investigations associated with the Tri-Party Agreement Milestones M-15 and M-45 are met (currently scheduled in 2008).</p> <p>Changes were made to the attached letter February 9, 2004, by Michael Collins and is being rerouted for your concurrence. Colleen Clark's, COM, and Bob Carosino's, OCC, comments were incorporated 02-23-04.</p>		
ROUTING LISTS			
1	Route List		Active
	● Collins, Michael S - Approve - Approved - 12/03/2003 1518		
	● Robertson, Owen C - Approve - Approved - 12/03/2003 1514		
	● Thompson, Mike - Approve - Approved - 12/04/2003 0704		
	● Morse, John G - Approve - Approved - 12/03/2003 1520		
	● Hildebrand, R Doug - Approve - Approved - 12/03/2003 1428		
	● Marvin, Marla K - Approve - Approved with comments - 12/17/2003 1501		
	● Dunigan, Paul F - Approve - Approved with comments - 01/08/2004 1602		

	<ul style="list-style-type: none"> <li>● Hollowell, Betty L - Approve - Approved with comments - 02/19/2004 1639</li> <li>● Sherman, Yvonne T - Approve - Approved - 02/23/2004 1105</li> <li>● Clark, Colleen C - Approve - Approved with comments - 02/23/2004 1105</li> <li>● McCormick, Matthew S - Approve - Awaiting Response <i>MM/S 2/23/04</i></li> </ul>		
2	Route List		Draft
No Assignees			
<b>ATTACHMENTS</b>			
Attachments	1. 04-AMCP-0101msc.doc		
<b>COMMENTS</b>			
<b>Poster</b>	Marvin, Marla K (Avery, Susan E) - 12/17/2003 0312		
	Approve		
	12/17/03 - Marla concurred w/corrections by hard copy. ~SEA		
<b>Poster</b>	Dunigan, Paul F (Dunigan, Paul F) - 01/08/2004 0401		
	Approve		
	Approve with these changes: Paragraph 2, line 2: insert "potential impacts of" between "..the" and "actions...." Paragraph 2, line 3: insert "the impacts of" between "...in relation to" and "other", and insert "past, present and reasonably foreseeable" between "other" and "actions that may...." Paragraph 2, line 4: delete "typically". Paragraph 2, lines 8 and 9: replace "compared to the" with "considered together with" Paragraph 2, line 9: delete "cumulative site-wide". Paragraph 2, line 9: replace "Hanford activities as a whole" with "DOE and other activities in the Hanford area".  PFXDJr. 1/8/04		
<b>Poster</b>	Hollowell, Betty L (Dawson, Jodi L) - 02/19/2004 0402		
	Approve		
	Approval contingent on the incorporation of comments provided to C. Castleberry. These comments were worked on by Y. Sherman, M. Collins, B. Carosino and Betty Hollowell.		
<b>Poster</b>	Clark, Colleen C (Avery, Susan E) - 02/23/2004 1102		
	Approve		
	2/23/04 - Approve w/comments. ~SEA		
<b>TASK DUE DATE HISTORY</b>			
<b>Modified</b>	01/05/2004 1104 - Castleberry, Connie J (Castleberry, Connie J)	<b>New Due Date</b>	01/08/2004 1700
<b>Modified</b>	02/10/2004 1508 - Castleberry, Connie J (Castleberry, Connie J)	<b>New Due Date</b>	02/20/2004 1700
<b>Modified</b>	02/23/2004 1124 - Castleberry, Connie J (Castleberry, Connie J)	<b>New Due Date</b>	02/23/2004 1700
<b>SUB TASK HISTORY</b>			
<b>Subtask#</b>	DOE-AMCP-C-2004-0101.1		
<b>Subject</b>	RESPONSE TO CONSENSUS ADVICE #153, NEED FOR SITE-WIDE CUMULATIVE IMPACT ANALYSIS AND RECEIPT OFFSITE WASTE		
<b>Originator</b>	Hollowell, Betty L		

<b>Routing List</b>   <i>No Active Routing List</i>
---

-- end of report --