



JUN 01 2004

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

Dear Mr. Martin:

**HANFORD ADVISORY BOARD (HAB) ADVICE #158 – 300 AREA EXPLANATION OF SIGNIFICANT DIFFERENCE (ESD)**

Reference: HAB letter from T. Martin to K. Klein, RL; R. Schepens, ORP; J. Iani, EPA; and L. Hoffman, Ecology, "300 Area Explanation of Significant Difference," dated April 2, 2004.

This letter is in response to HAB advice #158 in the reference. This advice requests "that 'unrestricted use' be the standard applied to these eight sites and all other sites along the Columbia River Corridor."

We note previous HAB advice (#125) makes a similar recommendation, that "the cleanup goal 'outside the 300 Area fence' should be unrestricted use."

In our response to advice #125 we said: "the reasonably anticipated future land use is industrial pursuant to U.S. Environmental Protection Agency policy and guidance and it is appropriate to use industrial cleanup standards for the 300 Area cleanup process. However, due to concerns expressed regarding the lack of an evaluation for the cost of cleaning up to an unrestricted use cleanup standard, the Tri-Party agencies are currently estimating the costs of this additional cleanup work for those sites 'outside the fence' of the industrial complex."

Since issuing the 300-FF-2 ROD in April 2001, the Tri-Party agencies have evaluated the additional cleanup that would be necessary to achieve unrestricted use levels for waste sites outside the "core industrial zone" of the 300 Area Industrial Complex. Based on this evaluation, soil cleanup levels for eight outlying waste sites were changed from industrial to unrestricted, and will use the same exposure scenario as the 100 Area. The eight sites are the 618-7 Burial Ground, 300 Vitrification Test Site, 618-13 Burial Ground, 600-47 Dumping Area, 316-4 Crib, 600-63 Lysimeter Facility, 600-259 Lysimeter Facility, and 618-10 Burial Ground.

Twenty-six other waste sites were also evaluated but were not considered for a change in cleanup standards due to their proximity to either the industrialized core zone of the 300 Area or the Energy Northwest Complex. The Tri-Parties believe that because of that proximity the reasonable anticipated future land use for these 26 waste sites remains industrial.

The 300 Area ESD includes a summary of the results of the cost evaluation referenced in the Tri-Party response to Advice #125. The ESD states: "The total estimated cost of remediating the eight waste sites to the unrestricted cleanup levels is approximately \$65 million, which is an increase of approximately \$750,000 from the industrial cleanup endpoint (the original cost of

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remediating the eight waste sites to industrial levels is approximately \$64.25 million). This represents an approximate 1% increase in the total estimated cost of remediating the eight waste sites. Incremental costs due to changing from industrial to unrestricted are primarily associated with the removal of additional volume of contaminated soil. Using unrestricted cleanup levels for the eight waste sites will likely reduce the long term costs of institutional controls and allow other potential beneficial uses of these outlying sites."

We appreciate the HAB's interest and support as we move ahead with cleanup. If you have any questions, please contact Beth Bilson, DOE Richland Operations Assistant Manager for the River Corridor, (509) 376-6628.

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by

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for

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ORP:TEO

cc: S. Waisley, DOE-HQ  
L. Hoffman, Ecology  
M. Gearheard, EPA  
J. Iani, EPA  
The Oregon and Washington  
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