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DEPARTMENT OF ECOLOGY
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2005 I-266
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March 28, 2005

Todd Martin, Chair
Hanford Advisory Board
713 Jadwin C-4
Richland, WA 99352

Dear Mr. Martin:

Reference: HAB Advice #170 – Hanford Buried Waste

Thank you for your letter expressing concern over current Department of Energy plans for the characterization, retrieval, treatment, and proper disposal of the large volume of unsegregated contaminated materials buried at the Hanford Site prior to 1970.

The advice requests that the U.S. Department of Energy (US DOE) perform characterization on all contaminated areas of the Hanford Site; that US DOE include these materials in planning retrieval, treatment and disposition; and that US DOE adequately fund characterization and subsequent plans and actions to safely dispose of these wastes. Additionally, the advice encourages the U.S. Environmental Protection Agency and the Washington State Department of Ecology (Ecology) to use their regulatory authority and to work cooperatively with US DOE to ensure implementation of the advice.

Ecology is working with the Tri-Party Agencies on a joint response to the Hanford Advisory Board (HAB) consensus advice. We anticipate the response will reflect both those areas where the agencies are in agreement as well as those areas where we may have differing views. Pending closure of those discussions, we anticipate a direct response to the advice within the next several weeks.

Sincerely,

Jay J. Manning
Director

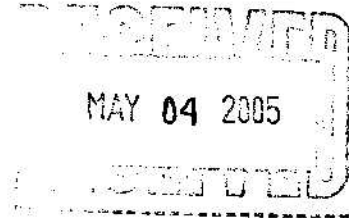




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD/INL PROJECT OFFICE
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

2005I-309

April 25, 2005



Mr. Todd Martin, Chair
Hanford Advisory Board
713 Jadwin, Suite 4
Richland, Washington 99352

Subject: HANFORD ADVISORY BOARD ADVICE #170 – HANFORD BURIED WASTE

Dear Mr. ~~Martin~~ *Todd*

The U.S. Environmental Protection Agency (EPA) has reviewed your advice regarding Hanford buried waste and agrees with the Board's premise that waste sites require characterization to support decision-making. I am sure the Board recognizes that characterization of heterogeneous waste material is technically challenging. Given the makeup of many of the waste sites in the 200 Area, we will not be able to reduce all uncertainty regarding contents of individual waste units; however, it is appropriate and necessary to collect sufficient data to make sound environmental decisions.

In regard to removal of waste, we have encouraged the Department of Energy to acknowledge that a certain percentage of waste from historical disposal (pre-1970) should be added to the baseline for possible offsite disposal.

EPA will continue to work with our partners to ensure that decisions are technically sound and based on adequate data. We will engage the Board as we continue cleanup of Hanford's central plateau.

Sincerely,

Nicholas Ceto, Program Manager
Hanford Project Office
Office of Environmental Cleanup

cc: Howard Gnann, ORP
Joe Voice, RL
Mike Wilson, Ecology



**U.S. Department of Energy
Hanford Site**

2005I-497

SEP 02 2005

05-AMCP-0388

Mr. Todd Martin, Chair
Hanford Advisory Board
713 Jadwin, Suite 4
Richland, Washington 99352

Dear Mr. Martin:

HANFORD ADVISORY BOARD (HAB) CONSENSUS ADVICE NO. 170, HANFORD BURIED WASTE

The U.S. Department of Energy (DOE) has reviewed the advice provided in your March 4, 2005, letter expressing serious concern regarding DOE's plans for characterization, retrieval, treatment, and disposal of pre-1970s era, non-segregated waste buried on the Hanford Site.

The HAB's concerns include: DOE has insufficient knowledge of the contaminated materials buried on the Hanford Site to make informed cleanup decisions, DOE has no basis to evaluate the appropriateness or effectiveness of any proposed solution, and DOE does not include these considerations in its critical Fiscal Year 2006 work scope planning and baseline funding request.

DOE entered into a series of collaborative workshop discussions with the State of Washington Department of Ecology (Ecology), the lead regulatory agency, precipitating the signed March 2005 Agreement, Completion Matrix, and Supporting Documentation for a phased approach in collaborative planning to ensure the 200 Area SW-1 and SW-2 remedial investigation activities for the waste buried in these Operable Units at Hanford, result in a thorough understanding of the risk these sites pose to the environment. The results of these investigation efforts will provide the information necessary to examine these burial grounds for potential remediation actions under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). A CERCLA record of decision on the remedial action for these burial grounds is anticipated in Fiscal Year 2009.

Accordingly, in concurrence with Ecology, DOE directed its contractor to execute the initial remedial investigation phase focusing on 22 radioactive waste burial grounds. During this phase, the contractor will collect, organize, and report findings of a detailed historical records search of waste streams and past practices for these 200 Area burial sites, and conduct non-intrusive sampling to include soil gas surveys, surface radiological measurements, and surface geophysics.

The second phase will include updating the work plan conceptual site models (CSMs) and will incorporate the results of the first phase sampling and information gathering. CSMs will be developed, as appropriate, for the individual burial grounds, trenches, and/or waste streams. Accordingly, CSMs will be used to conduct collaborative data quality objective processes leading to enhancements as applicable to the Remedial Investigation/Feasibility Study Work Plan.


Mr. Todd Martin
05-AMCP-0388


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SEP 02 2005

These activities are consistent with the HAB's concerns and advice, as well as the phased approach agreed upon by DOE and Ecology for this critical work scope, and have been accorded appropriate and relevant Fiscal Year 2006 budget recognition.

DOE thanks the HAB for continued interest and advice toward safe and successful environmental cleanup and closure activities at Hanford. If you have any questions, please contact us, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.


Keith A. Klein, Manager
Richland Operations Office


Roy J. Schepens, Manager
Office of River Protection

AMCP:JMS

cc: G. Bohnee, NPT
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