



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

July 9, 2012

Susan Leckband  
Chairperson  
Hanford Advisory Board  
EnviroIssues  
713 Jadwin Avenue, Suite 4  
Richland, Washington 99352

Re: EPA Response to HAB Advice # 257, "300 Area RI/FS and Proposed Plan"

Dear Ms. ~~Leckband~~: *Susan*

The U.S. Environmental Protection Agency appreciates the Hanford Advisory Board's initiative in providing advice on the pre-public comment version of the subject documents.

EPA's response to the Board advice points is provided below.

- The Board advises the TPA agencies to modify the milestone schedule for the 300 Area RI/FS decision to proceed with poly-phosphate sequestration as an Interim Remedial Measure/Expedited Response Action, until such time that this phosphate sequestration or some other technology can be tested and proven to be effective before proceeding to writing the final ROD and Proposed Plan.

*There are both a non-enforceable target date in the Tri Party Agreement of December 2011 and an enforceable milestone date of December 2012 for the Department of Energy to provide an RI/FS document and Proposed Plan to EPA. Both of these were completed when the DOE provided these documents to EPA at the end of December 2011. The TPA isn't structured to modify milestones after they have been completed.*

*Phosphate sequestration has been tested at Hanford and used elsewhere. It is still considered an innovative technology so considerable testing during deployment is appropriate. There is also remedial design work necessary to optimize the application the phosphate. For these reasons the proposed remedy includes a phase I which treats a small but significant part of the uranium and should provide information to optimize design for deployment at the rest of the uranium target treatment zone. EPA guidance for Proposed Plans and RODs explicitly identifies phased remedies for situations such as 300 Area uranium.*

- In the event the poly-phosphate sequestration technology testing is shown to be unsuccessful, the Board does not support monitored natural attenuation (MNA) as a solution. The Board advises the TPA agencies to consider the HAB's longstanding commitment to RTD values, especially to remove contaminants from near the river, when the next alternative selection is being made.

*The EPA agrees with the Board that at this time it is not appropriate for MNA to be a preferred alternative. The EPA has also been a strong advocate of RTD in the many instances when it is*

*appropriate. Much of the preferred alternative identified in the draft proposed plan is for RTD. For the distinct contaminant issue, uranium in the deeper portion of the vadose zone that can cause groundwater to exceed drinking water standards for uranium, in EPA's analysis, it is more appropriate to identify in-situ sequestration as the preferred alternative. If in-situ sequestration turns out not to be a viable cleanup approach, a new proposed plan --including the opportunity for public comment-- and ROD Amendment will be developed.*

- The Board advises the TPA agencies to develop future RI/FS documents that adequately reflect a comprehensive risk assessment (following the CERCLA process) and that address cleanup levels based on Model Toxics Control Act (MTCA) Method B, or Safe Drinking Water Act maximum contaminant levels. The Board advises the TPA agencies that cleanup plans should be developed assuming reasonably foreseeable future scenario exposures for people other than industrial workers and on contaminants of concern to which people, flora, and fauna are or may be exposed because of contact with Hanford groundwater and riparian habitat.

*The risk assessments did follow the CERCLA process and are adequate to support the decision. MTCA Method A, Method B and Method C were considered in proposing cleanup levels for the 300 Area. The Method A cleanup level for arsenic (20 parts per million) is the typical cleanup level selected by the Washington State Department of Ecology for residential cleanup areas. That cleanup level is proposed for the 56 square miles of the 300 Area proposed for cleanup to support future residential use. For all chemicals other than arsenic, MTCA Method B is proposed for cleanup of the 56 square mile area. For the small 0.5 square mile proposed for cleanup to be protective of industrial use, Method C was considered in proposing cleanup levels. In any of these areas, if cleanup levels need to be more stringent to be protective of the environment or groundwater, then those more stringent cleanup levels are proposed.*

- The Board advises the TPA agencies to finalize RI/FS documents, including all supporting documents, prior to the development of any Proposed Plan.

*It is EPA's intent that the RI/FS document published by DOE will be finalized to support the Proposed Plan for public comment. The Tri Parties have followed the TPA process for secondary documents which is the regulators review and comment on DOE-drafted documents.*

- The Board advises the TPA agencies to work to present RI/FS and supporting document information, including the data and details which support decisions, in a manner that is easy to read, concise, transparent, and readily accessible within the decision document.

*EPA supports the Board's goal.*

If you have any questions, feel free to contact either Larry Gadbois at 376-9884 or me at 376-8631.

Sincerely,

  
Dennis Faulk, Program Manager  
Hanford Project Office

cc: Jane Hedges, Ecology  
Tiffany Nguyen, DOE