

HANFORD ADVISORY BOARD

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

Advising:

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

CHAIR:

Steve Hudson

VICE CHAIR:

Susan Leckband

June 5, 2014

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Maia Bellon, Director
Washington State Department of Ecology
300 Desmond Dr. SE
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Re: Proposed Amendments to the Consent Decree from DOE and Ecology

Dear. Messrs Huizenga, Smith and Ms. Hedges and Ms. Bellon

Background

The Hanford Advisory Board (Board) has a long history of relying on our Board Values statement to ensure the consistency of advice and recommendations that it submits to the Tri-Party Agreement agencies: U.S. Department of Energy (DOE), U.S. Environmental Protection Agency and the Washington State Department of Ecology (Ecology). The Board encourages the Tri-Party agencies to reference, refer to and use these values (attached) as a guide during the current negotiations.

The Board continues to be very frustrated by constraints placed on DOE and Ecology that have limited open and transparent information sharing with the public, stakeholders and tribes – particularly where the tank waste program and Waste Treatment Plant are concerned. This lack of information inhibits the Board from providing timely, adequately informed advice and recommendations. As the Tri-Party agencies negotiate changes to the Consent Decree, the Board hopes that at some point during these negotiations, prior to their conclusion, the Tri-Party agencies will provide an opportunity for the open exchange of information with the public to allow for the exploration of alternatives to be shared with and considered by the public.

Envirolssues

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The Board continues to assert that DOE must honor its commitment to clean up the Hanford Site in a timely fashion. The Board has voiced concerns many times regarding the impacts of leaking tanks, inadequate waste storage capacity and the corresponding potential risks to human health and the environment. Delay after delay increases costs and increases risks to successful Hanford cleanup.

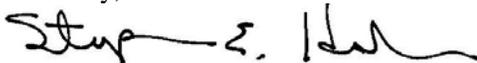
The Board looks forward to continuing engagement with the Tri-Party agencies, providing informed advice and recommendations.

Advice

The Board advises DOE and Ecology to

- Apply the attached Board Values during Consent Decree Amendment negotiation discussion and resolution development.
- Be open, transparent, and accountable to the public, stakeholders and tribes in both the upcoming Consent Decree negotiations and discussions, and the resulting Cleanup Agreement.
- Share information detailed enough with each other to enable the negotiating parties to resolve differences between the proposals in a timely manner.

Sincerely,



Steve Hudson, Chair
Hanford Advisory Board

This advice represents Board consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: Doug Shoop, Acting Manger, U.S. Department of Energy, Richland Operations
Jeff Frey, Deputy Designated Official, U.S. Department of Energy Richland
Operations Office
Dennis Faulk, U. S. Environmental Protection Agency
David Borak, U.S. Department of Energy, Headquarters
The Oregon and Washington Delegations

Hanford Advisory Board Values

Since its founding in 1994, the Hanford Advisory Board (Board) has issued more than 260 pieces of consensus advice on a myriad of topics related to the Hanford Site cleanup. Captured within that advice, and contained in this White Paper, are key, fundamental principles that reflect the Board's most important values related to the Hanford cleanup. The Board considers this a living document.

As presented, all the following values are of equal importance.

❖ Protect Worker Health and Safety

A healthy workforce and safe and environmentally conscious performance of work are fundamental core values. Workers should receive appropriate training and programs should be in place to ensure a safety-conscious work environment, without retribution against employees for reporting accidents, injuries, safety concerns, or other safety issues.

❖ Protect the Columbia River

The Columbia River is a local, regional, and national treasure. Cleanup actions must protect the river now and into the future. The Board continues to support the strategy to prioritize cleanup along the Columbia River corridor.

❖ Protect and Restore the Groundwater

The groundwater beneath Hanford is a valuable resource that will be much-needed in the future. It should be cleaned up and restored to the highest beneficial use – as drinking water and for all other uses.

❖ Protect the Broader Environment – Do No Harm during Cleanup or with New Development

Cleanup activities should protect the integrity of all biological resources, with specific attention to rare, threatened, and endangered species and their related habitat. Historic and cultural resources have value and should not be degraded or destroyed.

❖ Involve the Public

Hanford cleanup decisions can have impacts on people and the environment for hundreds of years to come. The public should have meaningful opportunities to influence cleanup decisions through open and transparent processes.

❖ Secure Sufficient Funding

The Hanford Cleanup is not discretionary. It is a federal obligation to address the Cold War environmental legacy and honor regulatory commitments to return the site to compliance with the nation's environmental laws.

Hanford Advisory Board Values

❖ **Vitrify Hanford's Tank Waste and Dispose the Treated Waste Safely and Permanently**

Vitrification of Hanford's tank waste is one of the most critical components of the Hanford cleanup. Successful completion and operation of a safe and effective Waste Treatment and Immobilization Plant is key to fulfilling this mission. The vitrified high-level waste should be disposed in a deep geologic repository.

❖ **Take Care of Hanford Waste First**

The Pacific Northwest already suffers a significant environmental burden from wastes previously disposed on-site at Hanford and waste that will be generated during the remainder of the Hanford cleanup. Hanford waste must be taken care of first. Off-site waste coming to Hanford should be limited to that which is currently being accepted.

❖ **Maintain the Integrity of the Tri-Party Agreement (TPA)**

The TPA and its structure of continuous, collaborative management between DOE, EPA, and the State of Washington is the backbone of Hanford cleanup.

❖ **Develop and Deploy New Technology, without Impeding Cleanup**

Cleanup should move forward using the most practicable, timely, available technology, while leaving room for future innovation.

❖ **Operate with a Bias for Remove-Treat-Dispose (RTD) vs. Barriers**

While the Board recognizes that waste will be left in place at Hanford, the Board's strong preference is for RTD, rather than leaving waste in place under a barrier. Institutional Controls are not a substitute for cleanup.

❖ **Remove Plutonium and Other High-Risk Materials from Hanford**

Because plutonium and other high-risk waste pose a hazard for such a long period of time, these materials that are reasonably accessible should be retrieved, regardless of when they were buried, and disposed of in an appropriate disposal facility.

❖ **Incorporate Long-Term Stewardship Needs in Current and Future Cleanup Decisions**

Future environmental and budgetary impacts must be understood and factored in cleanup decisions.