Nov. 7, 2003

Keith Klein, Manager
U.S. Department of Energy, Richland Operations
P.O. Box 550 (A7-50)
Richland, WA 99352

Roy Schepens, Manager
U.S. Department of Energy, Office of River Protection
P.O. Box 450
Richland, WA 99352

John Iani, Regional Administrator
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, WA 98101

Linda Hoffman, Acting Director
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: M-24 Groundwater Well-Drilling Change Package

Dear Mssrs. Klein, Schepens, Iani, and Ms. Hoffman,

The Hanford Advisory Board (Board) has for years recommended the Department of Energy (DOE) adequately fund the development of a compliant groundwater monitoring system and adequately characterize the subsurface to support the decision making process (Advice #65, 107, 120, and 145). We are encouraged with progress that has been made as evidenced by the proposed change package. A compliant system is necessary to protect human health and the environment for the long term as well as being needed to support cleanup decisions. We don’t believe the proposed M-24 well drilling milestone changes assure creation of a compliant monitoring network.

Accordingly, the Board offers the following advice on the M-24 milestone change package:

- DOE should fully fund the drilling of the 67 wells identified in the milestone to ensure installation of all wells as soon as possible.
• The currently assumed 15 well installations per year should be required as a minimum in the milestone.
• The Tri Party Agreement (TPA) agencies should define a compliant monitoring network (that includes a soil column reaching from the surface through the groundwater) for all waste sites and facilities, including the locations, purposes and proposed contaminants of concern. We recognize that this plan will need to be revised as wells are drilled and new information is gained, but believe that development of such a plan, in an open transparent process, subject to public review, will ensure that monitoring needs already identified in Ecology and Environmental Protection Agency inspections and notices are included. TPA milestones should then be negotiated to ensure such a network is initially attained within four years and maintained.
• In keeping with the Board’s advice on the site-wide groundwater strategy (Advice #145), a monitoring network plan should include the complete soil column (as defined above) monitoring for early detection and characterization.

Sincerely,

[Signature]

Todd Martin, Chair
Hanford Advisory Board

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

cc: Jessie Roberson, Assistant Secretary of Energy, U.S. Department of Energy Headquarters
    Marla Marvin, Deputy Designated Federal Official, U.S. Department of Energy
    Michael Gearheard, Environmental Protection Agency
    Michael Wilson, Washington State Department of Ecology
    Sandra Waitsley, U.S. Department of Energy Headquarters
    The Oregon and Washington Congressional Delegations

U.S. Senators (OR) Gordon H Smith
Ron Wyden

U.S. Senators (WA)
Maria Cantwell
Patty Murray

U.S. Representatives (OR)
Earl Blumenauer
Peter DeFazio
Darlene Hooley
Greg Walden
David Wu

U.S. Representatives (WA)
Brian Baird
Norm Dicks
Jennifer Dunn
Jay Inslee
Richard Hastings
Rick Larsen
Jim McDermott
George Nethercutt
Adam Smith

State Senators (WA)
Pat Hale
Mike Hewitt

State Representatives (WA)
Jerome Delvin
Shirley Hankins

HAB Consensus Advice #152
Subject: M-24 Groundwater Well-Drilling Change Package
Adopted: Nov. 7, 2003