



UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY
REGION 10
HANFORD/INL PROJECT OFFICE
825 Jadwin Ave., Suite 210
Richland, Washington 99352

OFFICE OF
ENVIRONMENTAL
CLEANUP

April 2, 2015

Steve Hudson
Chair, Hanford Advisory Board
713 Jadwin Ave
Richland, Washington 99352

Re: EPA Response to Advice 281

Dear Mr. Hudson: *Steve*

EPA appreciates the Board's advice regarding "In-trench Macroencapsulation of Waste at ERDF" from November 2014. In this advice, the Board advised that in-trench treatment at ERDF for a limited set of hazardous waste debris requiring macroencapsulation prior to disposal would result in a reduction of risk to workers from both radiological exposures and work place hazards.

I am pleased to inform you that the EPA Region 10 will be proceeding with an applicable or relevant and appropriate requirements (ARAR) waiver which will allow for in-trench macroencapsulation at ERDF for this limited set of hazardous waste debris. This ARAR waiver is based on greater risk, which means complying with the requirements would result in great risk to human health and the environment, justifying the request for a waiver.

Advice 281 was helpful to EPA Headquarters offices when considering whether and how to authorize a change in the treatment protocol for the limited set of hazardous waste debris. EPA expects to work with DOE and Ecology to finalize the supporting information and proposed plan and which will be issued for public comment in the next few months. After public comments are considered, an amended record of decision for ERDF will be issued.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis Faulk".

Dennis Faulk, Program Manager
Hanford Project Office