



JUL 12 1995

Reply to: HW-111

JUL 17 1995

Merilyn A. Reeves, Chair
Hanford Advisory Board
22250 Boulder Crest Lane, S.E.
Amity, Oregon 97101

Re: Hanford Advisory Board Advice Response

Dear Ms. Reeves:

I would like to take this opportunity to thank the Hanford Advisory Board (HAB) for their past advice which the U.S. Environmental Protection Agency (EPA) has evaluated and implemented.

The EPA has not always responded formally to the HAB's advice, however, I am responding below to the Board's advice and explaining how it has influenced EPA's decisions.

1: Values for Cleanup, June 1994

The advice formally adopted the values of the Future Site Uses Working Group Report and the Tank Waste Task Force. The EPA has used these values extensively since their initial adoption. The advice also addressed several issues associated with the Environmental Restoration Refocusing negotiations. The final package upholds the three values detailed in your advice to integrate characterization and cleanup, holding to the year 2018 for completion of cleanup and moving forward with cleanup of the 100 and 300 Areas.

2: Principles Regarding ERDF

The Environmental Restoration Disposal Facility (ERDF) advice has been incorporated into the proposed plan, record of decision (ROD), and design documents. Principal 2 of the advice was to limit waste only to Hanford cleanup waste. That requirement was included in the ROD. The Board also advised us to build ERDF in a phased manner and the ROD that the EPA and Ecology issued authorized the U.S. Department of Energy (DOE) to build only the first two cells. Additional expansion of ERDF will not occur without full public participation.

3: Guidelines for Interim Use of Pump and Treat

The Board detailed a number of points which has enabled aggressive action on the most serious groundwater problems at Hanford, where full compliance with applicable Federal and state laws was not possible. However, the EPA is not in agreement with

the Board's advice to use contaminated water to flush contaminated cribs. The EPA believes that the potential risks from implementation of this proposal are too high and may actually result in further groundwater degradation.

4: Cultural and Socio-Economic Impacts

This advice addressed both community stability and protection of cultural and biological resources during cleanup. The Superfund regulation, as well as specific procedures in place at Hanford, assure protection of sensitive biological species and cultural resources during the cleanup. The community stability portion of this advice is under the authority of the DOE as part of their responsibility outlined in the National Environmental Policy Act. The EPA supports DOE's work towards building a stable workforce and economic transition.

6: Spent Fuel, November 1994

The EPA has been tracking the development of the "path forward" for the K-Basins fuel. This project is consistent with the advice of the HAB. Removal of the fuel from K-Basins as-soon-as-possible is a top priority, as is the establishment of an interim dry storage facility at Hanford.

13: Off-Site Mixed Waste Acceptance, January 1995

The Board's advice was in support of the dialogue occurring as part of the site treatment plans and the Federal Facility Compliance Act. The EPA's involvement in these issues is minimal, however, DOE requested and was granted permission from EPA to accept off-site CERCLA waste at Hanford. The EPA's response to DOE required that any shipment of CERCLA waste to Hanford must adhere to the guidelines recommended in the Board's letter.

19: Public Involvement and Timely Public Meetings on Budget, April 1995

The EPA accepts the advice regarding regularly scheduled public involvement planning meetings. The initial meeting held in May provided a very productive dialogue between the agencies and stakeholders. The EPA continues to work with DOE and the State of Washington to bring more meaningful public involvement in the Federal budget process.

22: Technical Review of Proposed New Double-Shell Tanks, May 1995

The Board's undertaking, with the technical assistance of Dr. Glen Paulson, has been a major benefit to the tank waste program. The Paulson Report is well-written and conveys strong technical needs of the program. EPA used this advice in our direction to DOE for no new double-shell tanks.

It should be noted that several of the advice packages developed by the Board are not directly related to EPA's work at Hanford. Advice packages 5, 7, 11, 12, 15, 16, 18, 20, and 21 were either sent to DOE only or are outside the scope of EPA's work. No response on these advice packages will be forthcoming from EPA. The EPA looks forward to working with the facilitation team to develop a better tracking system of Board advice and agency responses.

In addition to the specific advice, the Board has issued to the agencies, I would like to convey my thoughts on other areas where the Board has been helpful to the EPA.

I believe one of the strongest attributes of the Board is the open communication it promotes, both with various stakeholders, and within the working relationship of the agencies. The Board's committee structure has helped focus the direction of the Hanford Project Office staff by acting as a sounding board. Through these committees we have been able to get a sense of public interest or concerns on various issues.

It is my belief that the Board has begun to develop a productive dialogue with DOE Headquarters, as demonstrated in the interactive teleconference which was held in early June. The Tri-Parties also have begun productive dialogue with DOE Headquarters through the work started at the St. Louis meeting, and we look forward to working with the Board to bring the ideas developed in St. Louis to fruition.

Sincerely,



Randall F. Smith
Director
Hazardous Waste Division

cc: John Wagoner
Dan Silver