

**FINAL MEETING SUMMARY**

**HANFORD ADVISORY BOARD  
RIVER AND PLATEAU COMMITTEE**

*April 8, 2014  
Richland, WA*

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*This is only a summary of issues and actions in this meeting. It may not represent the fullness of ideas discussed or opinions given, and should not be used as a substitute for actual public involvement or public comment on any particular topic unless specifically identified as such.*

**Opening**

Pam Larsen, River and Plateau Committee (RAP) chair, welcomed the committee and introductions were made. The committee tabled the March meeting summary until next month, since the draft summary was distributed the week prior and comments were not requested until later in the week.

*Announcements*

Kim Ballinger, U.S. Department of Energy – Richland Operations Office (DOE-RL), reminded attendees of the afternoon tour, directly following the meeting. The itinerary included stops at the 340 Vault, the 309 Reactor, the Environmental Restoration Disposal Facility (ERDF), and a drive-through of the 200W Area (including a demonstration of open air demolition strategy at the Plutonium Finishing Plant Closure Project). The bus for the tour was scheduled to leave from the federal building at 12:15 p.m., and participants were required to stop inside to pick up badges before departing.

## **Draft Advice: 100-D&H Proposed Plan, Draft A\***

### *Introduction*

Dan Serres introduced the draft advice regarding 100-D&H, two reactor sites at the horn of the Columbia River that have been combined into a single Remedial Investigation and Feasibility Study (RI/FS) unit because of the large contaminant plume that crosses between the areas. RAP generally agrees with DOE's RI/FS Proposed Plan, but would like to see the alternative go further in terms of cleanup and incorporate measures to reduce strontium contamination as well as chromium contamination. Dan noted that the current iteration of draft advice is very similar to that which was looked at during the March meeting, save the addition of a second advice point regarding institutional controls (IC) and remove, treat and dispose (RTD).

Dan commented that it was recently learned that the Washington State Department of Ecology (Ecology) may be pursuing an exemption from the Environmental Protection Agency's (EPA) National Remedy Review Board (NRRB). Alicia Boyd, Ecology described the NRRB process to the RAP Committee and expanded upon why the agencies are pursuing an exemption from full-NRRB review for 100-D&H cleanup. Alicia explained that the purpose of the NRRB is to examine cleanup strategies that are high-cost (over \$75 million) and to ensure that plans are consistent with laws, regulations, and Agency guidelines before the proposed plans are released for comment. There is a new option to the NRRB review process that allows regions to request an exemption from full-NRRB review, and Ecology, along with DOE and EPA, is in favor of pursuing this exemption for 100-D&H. Alicia noted that the cleanup of 100-K, a site that contained more severe contamination and had very similar proposed remedies to 100-D&H, has already undergone the review process, and Ecology does not feel that repeating the NRRB review will yield any new insights or advice.

Alicia gave further detail into the process of pursuing an NRRB exemption. The procedure involves the Regional EPA submitting a ten-page exemption request to the NRRB Chair, weighing in as to why they do or do not recommend an exemption to full-Board review. Other concerned entities (agencies, tribes, states, local governments, community groups, *et cetera*) can submit opinion documents along with the EPA's request, allowing the overall community to participate in the exemption process. All submitted community opinions must be ten-pages or less in length, and they are compiled and submitted by the EPA along with the agency's official exemption request.

### *Committee Questions and Responses*

*Note: This section reflects individual questions, comments, and agency responses, as well as a synthesis where there were similar questions or comments.*

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\* Please see Attachment 2: Draft Advice: Proposed Plan for Remediation of the 100-DR-1, 100-DR-2, 100-HR-1, 100-HR-2, and 100-HR-3 Operable Units (Draft A)

Q. There is currently a decision to not remediate the strontium in the 100-D&H RI/FS. Does this decision put the cleanup costs for 100-D&H under the \$75 million required for NRRB review?

R. *[Ecology] No. The cleanup cost for those areas will be over \$75 million regardless of the incorporation of strontium remediation. Pump-and-treat will likely account for at least half of the overall cleanup cost.*

C. My opinion is that a NRRB exemption is not a good idea at this point, partially because their advice and the “back-and-forth” that the process provides is very helpful to our group. I would recommend adding another advice point stating that we would prefer that the TPA not pursue this exemption because the extra layer, that extra look, makes sense. The public deserves to see the process occur, and I think that working towards an exemption sets a bad precedent.

Q. What is the timeline for this process? If the committee were to add an advice point regarding the exemption, would the timing work?

R. *[Ecology] The submittal should occur within the next month. Board advice developed within the next two months could be forwarded along with the packet.*

Q. How is the exemption decision made?

R. *[Ecology] Waivers are granted by the Chair and a member of the Federal Facilities Office. If they decline the exemption, the case continues to the full NRRB for review.*

Q. Could Ecology please elaborate on the incremental cost schedule or the risk reduction that an exemption would provide?

R. *[Ecology] Not receiving an NRRB exemption would likely require a time and travel commitment. If the waiver is not granted, a plan has to be put together and arranged in the sequence of the questions regarding the cleanup that the NRRB will ask when they convene. Then, several individuals would be required to travel to the next NRRB meeting, which, realistically, will take place in September 2014. We would then have to wait until approximately October 2014 for feedback from the NRRB, and the plan would not be out for public comment until the winter season.*

Q. If we have an approved process, how long would it take to remove the chromium and strontium contamination from 100-D&H?

R. *[Ecology] No estimates have been made regarding the cleanup timeline yet.*

C. I am not in a position to disagree with Ecology and EPA. If the agencies are confident about pursuing an exemption, I will trust the process, as well. Ecology has the same interests that I do.

C. If we, as a committee, are apprehensive about the RI/FS not addressing the strontium-90, we could use this opportunity to express our concern to the NRRB.

C. The summary of this conversation could be used for transmitting the RAP's opinion to the NRRB. This advice would not be adopted by the HAB until the next HAB meeting (June).

*R. [Ecology] There is no particular form or format that an opinion for the NRRB must follow, it just needs to be submitted and up to ten-pages in length. A summary of the meeting would suffice.*

C. I have not heard anything that convinces me that we should reject the request that we use the full-Board review. I doubt that the NRRB would want to go through a full review when 100-D&H are so similar to 100-K, especially when 100-K had more extreme problems. I will abstain from making a decision on the matter of review exemption.

C. I think that we should encourage a full-review of the proposed 100-D&H cleanup. We are talking about very important matters (effective cleanup, opening the river corridor to the public). We need to consider each site specifically and independently—each presents their own attributes and challenges, and we should work to stay away from drawing broad comparisons.

C. An exemption is not the norm. I think that we should look at this process critically and be wary of it simply because an exemption from review is a departure from the way that things typically progress.

C. I was involved in past instances of the NRRB process in the Hanford Site, and I have seen the process result in the EPA changing to a phased-approach for cleanup [in the 300 Area]. In my opinion, the Remedy Review Board has made a significant impact in the planning and the execution of past measures at the Hanford Site.

The committee agreed to add an advice bullet requesting a full review of the RI/FS and Proposed Plan by the NRRB rather than seeking an exemption to the process.

The committee reached consensus on the draft advice. It will be brought to the HAB in June for consideration.

Alicia noted that Ecology has already included a summary of the current draft of this advice in its draft submittal to the NRRB. She will update that summary based on the discussion today. It was clarified that this advice does *not* have HAB consensus and is not a HAB product. It will be considered for adoption by the HAB in June.

The committee and Ecology discussed if the summary of today's meeting could be included as an attachment to the submittal, since meeting summaries are public record. Typically, the timeline for summary review and adoption is not until the next committee meeting (May), but to meet Ecology's submittal timeline, the committee agreed to review the summary and adopt it via email. Ecology will include the final meeting summary as an attachment to the submittal.

### **Status Update on the Resource Conservation and Recovery Act (RCRA) Class II Modifications**

### *Regulator Update*

Madeleine Brown, Ecology, provided a brief status update on the RCRA Class 2 Modifications. There had been two separate comment periods; the second comment period is now closed and Ecology is on the verge of approving the second change. A transmittal is expected to go out today, and an email will likely go out between today and ten-days from now.

### *Committee Questions and Responses*

*Note: This section reflects individual questions, comments, and agency responses, as well as a synthesis where there were similar questions or comments.*

Q. Can you tell us what the changes are?

R. *[Ecology] I cannot share at the moment, but they are not significant.*

Q. Does this include the Central Waste Complex?

R. *[Ecology] No, it does not. They do not relate to Class III changes. In terms of changes, some are more significant than others. Class-3 changes are the most extreme. Class II changes are smaller in magnitude, but they still require public comment. The modifications are then either approved or denied, or an additional 30-day extension can be requested.*

RAP and DOE thanked Ecology for the status update.

### **Potential Advice Development: 100-F Remedial Investigation and Feasibility Study (RI/FS) and Proposed Plan Rev.0\***

Dan Serres and Dale Engstrom described that the issue managers had anticipated bringing draft advice to this meeting, but had not since the Revision 0 of the 100-D&H RI/FS and Proposed Plan had not yet been released for review. He encouraged committee members to review the Draft A advice that the Board had adopted in June 2013. Key issues for review include:

- DOE tension between cost and the efficiency of whatever remedy is presented, as well as the implementability of the proposed remedy
- Digging deeper into the ground than 15-feet (a common theme with river corridor decisions)
- Establishing a long-standing preference for the final pump-and-treat remediation alternative (GW-4) over the currently preferred Alternative GW-2, which only includes the use of

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\* Please see Attachment 3 – HAB Consensus Draft Advice #268 Re. 100-F Area Remedial Investigation/Feasibility Study (RI/FS) and Proposed Plan (Draft A)

institutional controls (IC) and monitored natural attenuation (MNA) for remediation. GW-4 differs in that it “adds treatment for the entire nitrate plume and does not include bio-augmentation.”

- The 100-F strontium-90 plume is moving, and the Board previously advised adopting a proactive solution (e.g. a permeable reactive barrier) to prevent the plume from migrating into the Columbia River. Allowing the strontium-90 to decay for 150 years, as stipulated by the GW-2’s MNA provision, is inappropriate given that existing, tested technology is available that can address the strontium-90 plume. The very long-time frame associated with MNA is a concern.

### *Committee Questions and Responses*

*Note: This section reflects individual questions, comments, and agency responses, as well as a synthesis where there were similar questions or comments.*

Q. Will issue managers review Rev.0 when it comes out?

R. *[IM] Yes. We thought that the Draft A advice was great, but that we could make it more concise and add any changes that need to be made. My understanding is that Rev.0 will not be very different from Draft A.*

Q. We may need to move very quickly on this to get draft advice to the full Board in June, because the comment period will not extend into next September [date of the next Board meeting]. It would be important to adopt advice during the public comment period.

R. *[DOE] We could consider extending the comment period from 30-days to 60-days.*

R. *If we need to cobble together something very quickly, we may need to get a consensus from the RAP Committee over email. We should discuss the timeframes for review at the May RAP meeting.*

The committee agreed that the issue managers should review the Rev. 0 when it comes out, anticipated for early May. The committee expects to discuss and/or develop draft advice regarding the Rev. 0 at the May RAP meeting. It was discussed that any advice would need to be as concise as possible, since the advice review and consensus process would have to occur via email in order to bring draft advice to the full Board in June.

### **Committee Business**

The committee discussed committee work in general; was the RAP serving the purpose it was intended? Was the RAP meeting agency expectations? Were there any big issues or topics not being addressed? No objections or concerns were raised and the committee generally agreed that it was meeting its HAB 2013/2014 Work Plan goals.

Kim Ballinger noted that Vanderbilt University's Consortium for Risk Evaluation with Stakeholder Participation (CRESP), a group which had interviewed Board members in the past at the request of DOE Headquarters, had requested to come to a future RAP or Board meeting to discuss their results. RAP committee members believed that they had a strong grasp on potential risks present in their scope of work, but were not strongly opposed to the potential of talking to a CRESP representative as it could potentially be an opportunity for the committee, CRESP, and the agencies to share their thoughts and opinions on the group's research.

*Three Month Work Plan\* and May Potential Meeting Topics Table*

The committee updated its 3-month work plan and will request a full-day meeting in May that will include the following topics:

- A briefing regarding principles for Central Plateau Cleanup.
- Revisiting the advice development for 100-F RI/FS and Proposed Plan Rev.0, and hearing a report from issue managers on changes that have been made between Draft A and Rev.0. No presentations were requested, but agency staff were requested to be present so that questions pertaining to the changes could be adequately addressed.
- A committee discussion to identify FY 2016 budget priorities for River Corridor.
- A joint briefing with the Tank Waste Committee (TWC) concerning the Waste Encapsulation and Storage Facility's (WESF) path forward, with attention given to the timeline and budget for removal to dry-caste storage as well as the Inspector General's recent findings pertaining to potential earthquake risk.
- Committee business, including updating the 3-month work plan, identifying potential topics and issues for the EIC Leadership Retreat in June, and briefly examining RAP work to determine if mid-course work adjustments are needed.

**Attachments**

Attachment 1: Transcribed flipcharts

Attachment 2: Draft Advice: Proposed Plan for Remediation of the 100-DR-1, 100-DR-2, 100-HR-1, 100-HR-2, and 100-HR-3 Operable Units (Draft A)

Attachment 3: HAB Consensus Advice #268 Re. 100-F Area Remedial Investigation/Feasibility Study (RI/FS) and Proposed Plan (Draft A)

Attachment 4: RAP Committee 3-Month Work Plan

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\* Please see Attachment 4 – RAP Committee 3-Month Work Plan

## Attendees

### Board members and alternates

Shelley Cimon	Liz Mattson (phone)	Richard Smith
Dale Engstrom (phone)	Maynard Plahuta	Bob Suyama
Gary Garnant	Gerald Pollet	Eugene Van Liew
Steve Hudson	Ed Revell	
Pam Larsen	Dan Serres	

### Others

Kim Ballinger, DOE-RL	Madeleine Brown, Ecology	Kelly Rhodes, CHPRC
Kris Skopek, DOE-RL	Alicia Boyd, Ecology	Alex Nazarali, CTUIR
Alex Teimouri, DOE-RL	Dib Goswami, Ecology	Dave Rowland, Yakama Nation
		Hillary Johnson, EnviroIssues
		Brett Watson, EnviroIssues