



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 7, 2022

22-NWP-003

Mr. Steve Wiegman, Chair
Hanford Advisory Board
245 Torbett St
Richland, Washington 99354

Re: Response to Hanford Advisory Board Consensus Advice #306 on Managing the Risk of Aging Structures and Keeping the Stakeholders Engaged

Reference: Letter dated April 23, 2020, EPA to USDOE, "Interim Stabilization of Waste Sites 216-Z-2 Crib, 216-Z-9 Trench, and 241-Z-361 Settling Tank"

Dear Mr. Wiegman:

The Department of Ecology (Ecology) reviewed Hanford Advisory Board (HAB) Consensus Advice #306, and we agree with several points in the advice. While Ecology is not the lead regulatory agency for this activity, we participated with the U.S. Environmental Protection Agency (EPA), Washington State Department of Health, and the U.S. Department of Energy (USDOE) through the evolution of work.

We would like to make the following observations on this issue:

- Ecology agrees that there should be a preference for conducting Non-Time Critical Removal Actions (NTCRA) over Time Critical Removal Actions (TCRA) whenever possible.
- Ecology agrees with EPA's position that the public would have been better involved in the decision making process by following the NTCRA public comment process before a decision was made (see reference). In their letter, EPA stated that they expected a response to comments for any significant public comments received during the public comment period. However, USDOE proceeded with work without a response to HAB Consensus Advice #306.
- Ecology agrees with EPA that it was essential for the Action Memorandum to cite the 200-PW-1/3/6 Record of Decision, which selected the remove, treat, and dispose of (RTD) remedy. USDOE stated in the Action Memorandum, after EPA suggestion, that the remedy would not be precluded by the TCRA.

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If you have any questions regarding Ecology's observations, please contact me at david.bowen@ecy.wa.gov or (509) 372-7905.

Sincerely,

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Program Manager
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