

Appendix: DRAFT HAB Advice on Central Plateau Cleanup Guidelines

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- 1) It does not appear that the Department of Energy is making an informed decision by setting a baseline relative to the future use, as per Treaty rights.
- 2) The similar or analogous sites approach to decisions demands an adequate amount of historical data and process knowledge upon which to base a defensible decision. Because of the complexity of past practices within the Central Plateau and ambiguities of waste management during processing days, there is no certainty for determining past practice off-norm occurrences and where and in what volumes, waste was distributed throughout the unlined burial grounds. Although we have, in past advice, (HAB advice #82) supported the concept of streamlining investigations, the Board questions the ability to employ the analogous sites approach with any accuracy in the Central Plateau. Additionally, application of the the “plug-in” approach, though reasonable in addressing river corridor waste site remediation, (HAB advice # 177) should be limited to waste sites where data clearly demonstrates a similarity between waste sites.
- 3) The likely failure of institutional controls preventing future excavation below ten to fifteen feet must be considered and the cleanup levels and points of compliance must be set to protect human health from exposures, above standards, when those controls fail. When excavations below ten and fifteen feet are reasonably likely and foreseeable, cleanup levels must be set to require cleanup to standards below fifteen feet.
- 4) HAB advice #145 speaks to the need for a “trigger level” on a location and contaminant-specific level geography. Points of Compliance should not be set to trigger many years into the future. Groundwater is a valuable resource with beneficial future uses that must not be restricted outside of the individual waste management unit points of compliance within the core zone. (HAB advice #132).
- 5) The HAB has long been a proponent of RTD and using the observational approach to tackle near surface mass contamination. (HAB advice# 226). It is a practice that has served us well at the Hanford site and reduced characterization and long-term Institutional Control costs.
- 6) (storm of the century)
- 7) The HAB has given advice multiple times on Institutional Controls. (HAB advice #63/63A) acknowledges that the 200 Area will be used for waste management activities well into the future; (HAB advice # 132) speaks to a continued human presence in the core zone providing an ongoing, active institutional interest vested in future management of the risks within the Central Plateau; and (HAB advice# 180) which address the need for better analyzes of, and support for Institutional Controls utilizing assumptions which are defensible.
- 8) Please see HAB advice #132.
- 9) The Hanford site has very successfully implemented deep vadose zone Pump and Treat activities in some perched water lakes above caliche layering. There are currently forty two deep vadose zone sites that have been identified where implementation of this technology would benefit the goal of bring groundwater back to drinking water standards. Further implementation of this technology across the site will reduce future risk to human health and the environment and support bringing groundwater back to its highest beneficial use.
- 10) Ecological receptors.
- 11) Risk range
- 12) A past, two day workshop, August 11-12, 2004 and subsequent report set the stage for public policy weigh-in on the use of Risk-Based End States and the vision for Central Plateau cleanup. How will DOE know what the “end” is, without mapping out a strategy for completion of remediation? (HAB advice #226)