Reply to
Attn Of: ECL-117

Mr. Doug Shoop, Assistant Manager for
Safety and Engineering
U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

Re: U.S. Environmental Protection Agency (EPA) Concurrence on The Second
CERCLA Five-Year Review Report for the Hanford Site

Dear Mr. Shoop:

EPA Region 10 has reviewed The Second CERCLA Five-Year Review Report for
the Hanford Site, signed by the U.S. Department of Energy, Richland Operations Office
on November 10, 2006. This is the first site-wide five-year review for Hanford written
by the U.S. Department of Energy (DOE). EPA delayed our review of the protectiveness
determinations until receiving the updated responsiveness summary and report in March
of 2007, as requested. EPA has now completed our review of the report with a focus on
the protectiveness determinations and the basis for them.

DOE should be commended for its thorough public involvement process with this
five-year review. As you know, some of the Hanford stakeholders wanted the review to
address a broad range of concerns regarding the operation of Hanford by DOE, not
traditionally within the scope of a five-year review. By statute, a CERCLA five-year
review is required to evaluate the performance of each selected remedy and to determine
whether each remedy is, or will be, protective of human health and the environment. To
your credit, DOE went beyond the statutory requirements and adhered to EPA and
Region 10 policy by also evaluating the other CERCLA operable units where remedial
decisions have not yet been made and remedial actions are not in place. We will continue
to work with DOE to address concerns raised by the public about remedial actions at
Hanford.

Based on our review of The Second CERCLA Five-Year Review Report for the
Hanford Site, EPA feels that DOE has generally done a good job of evaluating the
protectiveness of selected remedial actions and the current risk posed by Hanford.
has made independent determinations regarding the protectiveness of a number of the
selected remedial actions for the operable units at Hanford. These EPA determinations
are enclosed and as appropriate concur with, clarify, or replace protectiveness statements
in DOE's The Second CERCLA Five-Year Review Report for the Hanford Site. EPA is
providing this new language for clarification to the five-year review and to address the
need to describe actions needed within the protectiveness statements. Specific
differences between DOE's determinations and EPA's protectiveness determinations are
discussed in the enclosed Protectiveness Determination Discussion document. A primary
difference is EPA's conclusion that for the river corridor soil operable units, the
appropriate determination is to defer making a protectiveness determination until
additional information, primarily the River Corridor Baseline Risk Assessment, can be
completed and reviewed.

EPA has developed three new action items in addition to those identified by DOE
in the five-year review report.

Action 1-3: Reassess and resubmit to EPA the protectiveness
determinations for operable units 100-BC-1, 100-BC-2, 100-DR-1,
100-DR-2, 100-FR-1, 100-FR-2, 100-HR-1, 100-HR-2, 100-HR-3,
100-IU-2, 100-IU-6, 100-KR-1, 100-KR-2, 100-KR-4, 100-NR-1,
300-FF-1, and 300-FF-2 using new information from the River Corridor
Baseline Risk Assessment and submit to EPA an Addendum with, as
appropriate, updated Protectiveness Determinations, Issues, and Follow-
Up Actions. Due 2/15/2008 to EPA.

Action 2-2: Reach agreement between the Tri-Party Agencies on a
strategy and schedule to obtain final records of decision in the river

Action 2-3: Submit a TPA change package with new milestones for
submitting RI/FS work plans and proposed plans for all operable units in
the river corridor. New milestones shall require submission of RI/FS work
plans and proposed plans for final actions at all of the following operable
units that do not already have these documents approved: 100-BC-1, 100-
BC-2, 100-BC-5, 100-DR-1, 100-DR-2, 100-FR-1, 100-FR-2, 100-FR-3,
100-HR-1, 100-HR-2, 100-HR-3, 100-IU-2, 100-IU-6, 100-KR-1, 100-
KR-2, 100-KR-4, 100-NR-1, 100-NR-2, 300-FF-2, and 300-FF-5. Due
2/1/2008 to EPA.

These action items are more extensively discussed in the enclosed Protectiveness
Determination Discussion.

Please note that the need for an Addendum does not affect the due date for
the next site wide Hanford five-year review, which is due five years from the date of this
letter. Therefore the due date is May 4, 2012. DOE and EPA both have statutory and
public obligations to complete these reviews in a timely manner. The delayed nature of
this five-year review report has taught us that all parties involved in the next review
should make arrangements for the early planning and execution of the review process.
EPA is expecting the Department of Energy to take steps necessary to make conducting
five-year reviews and completing the action items from the review Tri-Party Agreement
commitments.
If you have questions concerning this letter, please call me at 206/553-1090, or contact Nick Ceto, manager of the Hanford Project Office at 509/376-9529 (email: Ceto.Nicholas@epa.gov).

Sincerely,

Daniel D. Opalski, Director
Office of Environmental Cleanup

Enclosures

cc: Cliff Clark, DOE
    Jane Hedges, Ecology
    John Price, Ecology
    Nicholas Ceto, EPA
    Alicia Boyd, EPA
    David Werley, FWS
    Mary Baker, NOAA
    Susan Leckband, HAB
    Gabe Bohnee, NPT
    Rebecca Miles, NPTEC
    Russell Jim, YN
    Stuart Harris, CTUIR
    Ken Niles, ODOE
    Brent Foster, Columbia Riverkeeper
    Gerald Pollet, Heart of America Northwest
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