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A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act

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US Environmental
Protection Agency
Washington State
Dept of Ecology

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November 6, 2014

Doug Shoop, Acting Manger
U.S. Department of Energy, Richland Operations
P.O. Box 550 (A7-75)
Richland, WA 99352

Dennis Faulk, Manager
U.S. Environmental Protection Agency, Region 10
Richland, WA 99352

Re: In-trench Macroencapsulation of Waste at ERDF

Dear Messrs. Shoop and Faulk,

Background

Worker safety during the performance of work to achieve environmental clean-up at Hanford is a core value of the Hanford Advisory Board (Board) as articulated in the Hanford Advisory Board Values White Paper (11/2/2012). As also noted in that document, the Board encourages and applauds every effort the U.S. Department of Energy (DOE) makes to reduce industrial hazards and radiological exposure in the workplace for workers performing clean-up.

The current practice of macroencapsulation at the Environmental Restoration Disposal Facility (ERDF), for a limited set of waste, involves treatment of material at the surface and outside of ERDF before placement into ERDF trenches for disposal. The at-surface protocol for treatment of these wastes requires handling, by crane manipulation, multiple times prior to placement within an ERDF trench. Further, this practice results in an increased risk of industrial accident and the potential for an airborne release. Most importantly, the time that workers must be in relatively close proximity to the waste to accomplish macroencapsulation at-surface results in an otherwise avoidable radiological exposure.

It is the Board's understanding that in-trench macroencapsulation, (treating the waste within an ERDF trench), will reduce worker radiological exposure and potential environmental release by reducing the number of times waste must be handled, while still accomplishing the regulatory treatment requirements. The Board supports a common sense, streamlined approach to reducing both worker risk and the potential for airborne releases while

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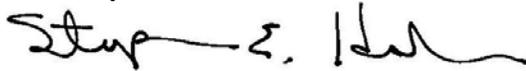
achieving the goals of remediation. However, this approach should be limited to well-defined wastes for a specified period of time and not be a precedent for avoiding regulated facilities for treating equipment.

In general, the best practice to protect worker safety and the environment would be to utilize an engineered facility employing appropriate air controls and containment. Since DOE forecasts increasing amounts of large-length equipment and other materials requiring macroencapsulation treatment to meet Resource Conservation and Recovery Act Land Disposal Restrictions prior to disposal, the Board provides the following advice.

Advice

- The Board advises in-trench treatment at ERDF for a limited set of hazardous waste debris requiring macroencapsulation prior to disposal. (i.e. extra heavy or long-length or irregular shaped waste). The Board believes this change in protocol will achieve a reduction of risk to workers of both radiological exposure and hazards within the workplace.
- The Board also advises that the Tri-Party Agreement agencies continue to review all treatment options which may be more protective of both worker safety and the environment for long-term needs.

Sincerely,



Steve Hudson, Chair
Hanford Advisory Board

This advice represents Board consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: Mark Whitney, Acting EM Assistant Secretary, U.S. Department of Energy, Headquarters
Kevin Smith, Manager, U.S. Department of Energy, Office of River Protection
Jeff Frey, Deputy Designated Official, U.S. Department of Energy Richland Operations Office
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