

Hanford Communities

*Richland * Kennewick * Pasco * Benton County * Franklin County * Port of Benton*

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September 8, 2014

Robin Richardson
Charlotte Bertrand
US EPA Headquarters
Ariel Rios Building MC: 5202P
1200 Pennsylvania Ave. NW
Washington D.C. 20460

Dear Ms. Richardson & Ms. Bertrand;

The Hanford Communities are aware that the Department of Energy (DOE) is seeking to move forward with CERCLA cleanup at Hanford in a manner that addresses the RCRA Land Disposal Restrictions (LDRs) for a limited amount of large, heavy hazardous waste debris that is contaminated with radioactive material. The current plan contained in a Record of Decision (ROD) is to dispose of this material in the on-site ERDF landfill. DOE is seeking a CERCLA ARAR waiver to treat this debris to EPA standards after the waste is placed in an on-site disposal cell. The process proposed is referred to as "in trench macroencapsulation".

The waiver would allow for treatment by macroencapsulation, of certain wastes inside the ERDF facility where site conditions suggest "compliance with ARAR requirements will result in greater risk to human health and the environment."

The Hanford Communities have received a presentation about the amount of worker exposure to radioactive waste if large heavy waste items have to be handled and packaged in another location and then moved to ERDF. It is very clear that in trench macroencapsulation makes sense. This will achieve environmental protection while reducing worker exposure to the radioactive, heavy, and irregular materials at a significant cost savings.

We advise the Environmental Protection Agency to issue a waiver and amend the Record of Decision for the ERDF landfill to allow macroencapsulation of appropriate waste.

Sincerely,



Robert J. Thompson, Chairman
Hanford Communities

CC: Dennis Faulk, Program Manager, EPA Hanford Project Office
Jane Hedges, Nuclear Waste Program Manager, WA Depart of Ecology
Doug Shoop, Acting Manager DOE Richland Operations Office