

HANFORD ADVISORY BOARD 0048551

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

Advising:

US Dept of Energy
US Environmental
Protection Agency
Washington State Dept
of Ecology

December 5, 1997

053982

Chuck Clarke, Regional Administrator
U.S. Environmental Protection Agency, Region 10
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Richland, WA 99352

Subject: 200 Area Soils Remediation Change Package

Dear Messrs. Clarke, Fitzsimmons and Wagoner:

Background

The Tri-Party agencies have proposed a change to the Tri-Party Agreement that redefines how waste sites will be investigated in the 200 Areas. Key points of the new methodology include reorganizing 32 operable units into 23 like waste groupings. In addition, the proposed change would align Superfund work plans with RCRA closure plans. The approach is to investigate a representative number of sites of each waste group to make a decision on the way to remediate those sites. Additional site-specific characterization work would be performed as part of the design or implementation of the remediation for each site.

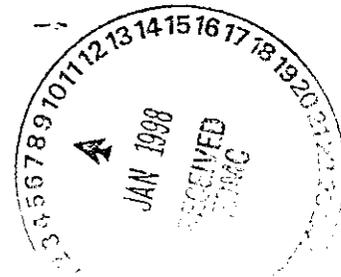
Advice

The Hanford Advisory Board offers the following consensus advice on the proposed Tri-Party Agreement change package:

1. The Board supports the proposed amendments to the Tri-Party Agreement. They appear to be a reasonable approach to streamline characterization needed prior to remedial decisions on 200 Area waste sites.
2. Although the Board supports the concept of streamlining investigations, the Tri-Party agencies should clarify that information will need to be collected on a site-specific basis to validate closure decisions.

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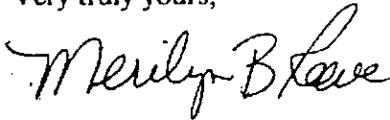
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3. The proposed amendments commit DOE to develop an implementation plan to lay the foundation for further work. The Board urges that the parties involve the stakeholders and tribal nations in development of the implementation plan.
4. The Board recommends that a clear process for making decisions on remedial actions be identified in the implementation plan. The 200 Area Strategy Document is not a remedial action decision document and should not be used as such.

We look forward to your response and to periodic progress updates on this matter.

Very truly yours,



Marilyn B. Reeves, Chair
Hanford Advisory Board

cc: Al Alm, Department of Energy Headquarters
Alice Murphy, Designated Federal Official
The Oregon and Washington Congressional Delegations
Randy Smith, Environmental Protection Agency
Dan Silver, Washington Department of Ecology

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

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