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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 23, 1998

Dr. David Shafer
U.S. Department of Energy
P.O. Box 550, MSIN: S7-54
Richland, WA 99352



Dear Dr. Shafer:

Re: Continued Involvement of the SX Expert Panel

Over the past two years, the Washington State Department of Ecology (Ecology) has been actively involved with the developing vadose zone issue at the Hanford Tank Farms. Ecology has long felt that a logical, systematic effort to understand the transport of contaminants in the vadose zone is imperative, not only for the tank farms, but for the Hanford Site as a whole. Ecology was pleased that the U.S. Department of Energy (USDOE) formed both a Tank Waste Remediation System (TWRS) Vadose Zone Program (Program) and a panel of external experts to review and advise the Program.

The current SX expert panel, created in March 1996, has performed commendably in meeting the objectives of evaluating and analyzing available data on the vadose system beneath the tank farms. Ecology has been very impressed with their mastery of the technical disciplines relevant to the study of the vadose zone and their recommendations for future scientific studies. At this point in time, the SX expert panel has logged over two years of experience with vadose zone characterization at the SX Tank Farm. The panel has also reviewed and evaluated information from Waste Management Areas (WMA) B, BX, and BY. It is currently reviewing the most recent version of the TWRS Vadose Zone Program Plan.

To date, Ecology has concurred with all of the recommendations from the panel. The panel members have exhibited a very high degree of professionalism and they have contributed substantially to the progress that has been made in understanding vadose zone contaminant transport. The panel's commitment to scientific objectivity and its perseverance in making and defending controversial conclusions on the state of vadose zone understanding at Hanford has earned it the respect and trust of both Ecology and stakeholders. It is Ecology's view that trust and respect among all affected parties are essential to the success of the Program. Given that perspective, Ecology believes that losing a trusted panel and the collective insight accumulated by it will be a serious setback to the progress made in TWRS vadose zone characterization.

Ecology has recently imposed the corrective action requirements of the Washington Administrative Code (WAC) 173-303-646 on eight single-shell tank farms that have leaked

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dangerous waste and dangerous waste constituents to groundwater. Both Ecology and USDOE have acknowledged that the vadose zone issues facing TWRS are immediate. Both parties have agreed TWRS vadose zone issues will continue to be addressed aggressively and at some point will be interfaced with the Sitewide Groundwater Vadose Zone Integration Project.

Unfortunately, an inadequate level of funding by USDOE suggests a lack of commitment on the part of USDOE to address TWRS vadose zone issues aggressively. Therefore, to prove its commitment to resolving these issues, USDOE must commit to fully fund both the TWRS Vadose Zone Program and the SX expert panel. Ecology believes it is imperative that the SX expert panel continue to provide advice to the TWRS Vadose Zone Program.

Ecology cannot stress enough the importance of understanding the transport of contaminants in the vadose zone. This understanding is fundamental to the successful cleanup of the site. In view of the importance of the issues facing the TWRS program, the USDOE must continue either the SX expert panel or a preponderance of scientific talent from the SX expert panel in its efforts to support the TWRS program. Ecology suggests USDOE factor this oversight review into the TWRS corrective action plans required by Ecology's July 10, 1998, letter. Ecology believes any corrective action plan that does not continue with the professional oversight provided by the SX Panel would be incomplete.

If you have any questions, please contact me at (509) 736-3018, or Stan Leja at (509) 736-3046.

Sincerely,



Dr. Alex Stone, TWRS Project Manager
Nuclear Waste Program

AS:SL:sb

cc: Bob Alvarez, USDOE
Rich Holton, USDOE
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David Shafer, USDOE
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Administrative Record: SST TSD S-2-4 and Vadose Zone Characterization