



# Oregon

Theodore R. Kulongoski, Governor



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September 29, 2006

**RECEIVED**  
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**EDMC**

Mr. Rudolph Guercia  
U.S. Department of Energy  
P.O. Box 550, MS A3-04  
Richland, WA 99352

Re: DOE/RL-2005-87, 300 Area Engineering Evaluation/Cost Analysis #3

Dear Mr. Guercia:

Oregon appreciates the chance to comment on the Engineering Evaluation/Cost Analysis #3 (EE/CA) for Hanford's 300 Area. The report evaluates alternatives for non-time critical removal of buildings from the 300 Area, and is important because it helps define DOE's priority path and timeline for cleanup of the 300 FF-2 Operating Unit (OU). The broad goals and approach considered in the EE/CA are consistent with our values for Hanford cleanup; we support expeditious and effective cleanup of the area, including removal of structures that impede cleanup. We do have several concerns, discussed below, with DOE's selection of alternative #2 (demolition of all remaining structures in the 300 Area to meet milestone M-94-00 by September 2015) as the preferred alternative.

Our review was complicated by what seems to be uncertainty by the U.S. Department of Energy (DOE) in its plans for the 300 Area, and associated uncertainty in the completeness of proposed alternatives in this EE/CA. While this document was open for review, we became aware that DOE is reconsidering plans for the 300 Area, as described in comments attributed to Megan Barnett of DOE in the September 18, 2006 Tri-Cities Herald. As described in this article, DOE has begun consideration of a plan to keep several 300 Area buildings for use by Pacific Northwest National Laboratories (PNNL), and is determining whether keeping those buildings would be safe and could stay within the cost range and cleanup schedule for the 300 Area. Because this option was not included or analyzed in the current EE/CA, and because decisions whether to retain some buildings will be tied to uncertain future federal funding, stakeholders cannot effectively evaluate this alternative in the context of the current process. We assume any tentative DOE decision to retain buildings in the 300 Area will lead to a revised or amended EE/CA for review and comment.

DOE faces difficult decisions regarding continued use of buildings in the 300 Area by PNNL. DOE's preferred alternative for the area calls for expeditious removal of all remaining buildings in the 300 Area by 2015. This alternative does not include any contingencies for delays in construction of replacement buildings. Given the tightness of funding, it seems unlikely that replacement buildings can be designed, funded and completed by 2015. As such, Alternative 2

does not address the likely need for continued use of several buildings that are presumably contaminated and are likely to interfere with cleanup of the 300 FF-2 OU. This concern will be exacerbated if DOE makes a decision to continue using, rather than replace, these facilities. Oregon supports the continued use of existing facilities when it does not substantively impede cleanup.

After careful review of the alternatives described in the EE/CA, Oregon does not fully endorse either alternative #2 (deactivation, decontamination, decommissioning, and demolition, or D4) or alternative #3 (surveillance and monitoring, followed by D4). Both of these alternatives call for removal of all remaining buildings in the 300 Area, and differ primarily in the schedules for removal. Neither alternative considered overall minimization of risk to human health and the environment in the 300 Area. Moreover, DOE's preferred alternative (#2, D4) is likely not fully implementable because (as noted above) there are likely to be delays in building replacement buildings.

For Oregon, the highest priority for Hanford is waste cleanup to protect human health and the environment. Rather than spending funds on removal of uncontaminated buildings, we would prefer to see a more targeted effort towards cleanup of burial grounds and other waste sites within the 300 FF-2 OU. To the extent that 300 Area buildings are significantly contaminated and/or they impede cleanup of the FF-2 OU, prompt demolition is appropriate and prudent. However, since the incremental increase in costs for deferred demolition as presented in the EE/CA is minimal (< 5%), we urge DOE to defer demolition of buildings that do not impede cleanup and are not themselves contaminated. Funds should then be redirected to cleanup of the 300 FF-2 OU. Empty buildings do not pose a threat to the groundwater and the Columbia River, but wastes pose a very real threat until their removal.

The EE/CA sidesteps difficult decisions that must be made regarding future land uses in the 300 Area. Given the divergent perspectives of DOE and the City of Richland regarding future land uses of this area, we strongly encourage DOE to plan and clean to standards consistent with the least restrictive land use. Language in this and other recent documents indicates a continued preference by DOE to clean up to the lowest possible standard. Cleanup to a lower standard could result in environmental and health impacts. Further, it would mean that DOE is either precluding options for future use of the area, or is forcing additional cleanup in the future when land use decisions for the 300 Area are modified to be consistent with needs of the City of Richland.

The document does not address restoration of the upland ecosystems following demolition. Although mitigation or restoration of the 300 Area is not required under the Hanford Biological Resources Mitigation Strategy (BRMiS), mitigation of ecological degradation is consistent with the goals of BRMiS. To the extent that mitigation is not incorporated into cleanup of the 300 FF-2 OU, we strongly encourage DOE to incorporate ecological restoration of the 300 Area into Removal Action Objectives in Section 3.0 and to add cost estimates for restoration in Section 4.

Section 5.4.7 could be construed as suggesting an irreversible and irretrievable (I&I) commitment of resources in vadose zone soils and groundwater of the 300 Area following cleanup in accordance with the 300-FF-2 record of decision. An EE/CA is not an appropriate

forum for proposing an I&I commitment, and we encourage addition of unambiguous language making it clear that no such I&I commitment is being proposed.

We look forward to continuing our ongoing work with DOE to achieve efficient and effective cleanup of the Hanford site, including the 300 Area. If you have any questions or would like to discuss our comments, please contact Paul Shaffer of my staff at 503-378-4456.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Niles". The signature is fluid and cursive, with the first name "Ken" being more prominent than the last name "Niles".

Ken Niles  
Assistant Director

cc: John Price, Washington Department of Ecology  
Alicia Boyd, U.S. Environmental Protection Agency  
Hanford Natural Resources Trustee Council