

HANFORD ADVISORY BOARD

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

November 4, 2005

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Re: 200 BC Cribs Focused Feasibility Study and Proposed Plan

Dear Messrs. Klein and Bogert,

Background

The Hanford Advisory Board (Board) recognizes that the Environmental Protection Agency (EPA) and the Department of Energy (DOE) are currently in a disagreement over resolving comments on Draft A of the Focused Feasibility Study and Proposed Plan (FFS/PP) for the 200 Area BC Cribs and Trenches Waste Sites. This disagreement centers on whether several cribs should be partially retrieved prior to capping (EPA's position), or capped without retrieval (DOE's position). DOE believes that worker exposure during retrieval would be too great to justify the environmental benefits of retrieval. EPA disagrees.

In this disagreement, both EPA and DOE cite their position as being responsive to Board advice. The Board thanks the agencies for directly considering the Board's values in considering remedial alternatives. It appears that EPA's position is more consistent with the Board's advice in that it places a higher priority on the Retrieve, Treat and Dispose (RTD) option (see Board Advice #173). However, further examination of the information underlying this disagreement is necessary to reach a final decision.

The Board continues to prefer the RTD alternative for all cleanup activities (See Advice #173). The Board recognizes that in some cases complete RTD may be technically impracticable, and that capping may be required.

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measurements and modeling show that much of the contamination of high concern lies between 20 and 40 feet beneath the soil surface, and can be retrieved without the high costs and impracticalities of excavating to 200 feet. The Board's stated bias is for Remove, Treat, and Dispose as the preferred remediation pathway.

In addition, the 200-UW-1 Proposed Plan must include an Institutional Control plan covering all relevant time periods.

Consequently, we wish to reiterate and expand on our previous advice.

Board Advice:

- We continue to advise that the proposed plan be revised as previously recommended, ensuring compliance with the Model Toxics Control Act (MTCA) and the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). In addition, we advise the inclusion of additional analyses, as follows, with cost comparisons of alternative compliant technology and schedules for public review and comment on:
 - An analysis of excavation to a depth of 20-40 feet. The Board believes that the initial evaluation of an excavation to a 200-foot depth utilized an unrealistic scenario. A more strategic approach, minimizing excavation depth, but addressing high source-term contamination removal, should be fully evaluated.
 - An analysis of the loss of institutional controls before 150 years. DOE needs to revise their IC Plan to identify what actions will be taken after site closure to prevent radiation hazardous exposure to non-DOE workers/residents/Native Americans. DOE also needs to identify the federal agency responsible for any post-closure control actions and corresponding funding source and level for that agency. Additionally, DOE should engage the Board and the public in discussions regarding recommended IC Plan changes.
 - An analysis of As Low as Reasonably Achievable (ALARA) calculations regarding waste site remediation considering all existing new or emerging technologies for retrieval, treatment and disposal (e.g., remote handling, guzzlers and soil solidification).
- Before capping is selected as a method of final disposition for a waste site, DOE should demonstrate how it has applied Board Advice #173 in its decision making process.

Sincerely,



Todd Martin, Chair
Hanford Advisory Board

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.

cc: Michael Bogert, U.S. Environmental Protection Agency, Region 10
Howard Gmann, Deputy Designated Federal Official, U.S. Department of Energy
Nick Ceto, Environmental Protection Agency
Michael Wilson, Washington State Department of Ecology
Melissa Nielson, U.S. Department of Energy Headquarters
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