



Nez Perce

ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT

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August 13, 2019

William F. Hamel, Assistant Manager
Richland Operations Office
US Department of Energy
PO Box 550, MSIN: H5-20
Richland, WA 99352

Subject: *PROPOSED PLAN FOR INTERIM ACTION REMEDIATION OF THE 200-BP-5
AND 200-PO-1 OPERABLE UNITS, DOE/RL-2018-58, DRAFT A.*

Dear Mr. Hamel:

The Nez Perce Tribe Environment Restoration and Waste Management (ERWM) appreciates the opportunity to collaborate with the US Department of Energy on Hanford groundwater and vadose zone issues with respect to the Proposed Plan for Interim Action Remediation of the 200-BP-5 and 200-PO-1 Operable Units DOE/RL-2018-58, Draft A ("Proposed Plan"). ERWM works to protect and restore Nez Perce cultural and natural resources in the Hanford area. Protecting and perpetuating these natural resources is at the heart of ERWM's responsibility to the long-term survival of Nez Perce people. Contaminated natural resources prevent connection to the land and water by tribal and non-tribal people alike.

The Proposed Plan states "Uranium and technetium-99 are the contaminants of concern (COCs) for this interim action, whereas the other 33 groundwater contaminants exceeding DWSs in the target remediation areas (e.g., tritium, I-129, nitrate, and 34 cyanide) are identified as co-contaminants and are not the objective of this interim action." We recommend all groundwater contaminants in the target remediation areas should be characterized and treated.

We do not support Alternative 2. Alternative 3 restores the 200-BP-5 OU to the most beneficial use more efficiently and is more protective of human health and the environment in both the short and long-term. It is impossible to predict the direction of flow of the Gable Gap plume for an 800-year time period. During that time, it would remain a potential source of technetium-99. It is not reasonable to estimate the future cost of remediation and institutional controls (IC) for 800 years. The ability to cut the remediation timeframe from 800 to 10 years is a more cost-effective option.

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On page 3 the Proposed Plan states, “[a] final ROD may address future contamination in groundwater from the vadose zone sources after the overlying source OUs and *waste management areas (WMAs)* are adequately characterized to determine future risk to groundwater.” The final ROD and any documents preceding the ROD need to address all future contamination.

We appreciate your consideration of our recommendations in your remediation efforts. If you have any technical questions please contact Marissa Merker at (208) 621-4700, or by email at marissam@nezperce.org. I can be reached at (208) 621-4710 or jackb@nezperce.org. We look forward to hearing from your office to improve and expedite the work needed to remediate Hanford’s groundwater with the goal of protecting the Nez Perce Tribe’s retained treaty rights and the Columbia River.

Sincerely,



Jack Bell
ERWM Director

cc: Laurene Contreras, YN
Mathew Johnson, CTUIR
Dave Einan, EPA
Ken Niles, ODOE
Alex Smith, Ecology
Greg Phillips, DOE/RL