UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
HANFORD/INL PROJECT OFFICE
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

May 16, 2012

Matthew S. McCormick
Manager
U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

Re: Third Five-Year Review Report, Hanford Site, April 2012

Dear Mr. McCormick:

The U.S. Environmental Protection Agency has reviewed the five-year review report for the Hanford Site. The report provides a summary of the status of the cleanup and protectiveness of the actions for operable units for which Records of Decision and Interim Records of Decisions have been issued. The report also discusses the actions that have occurred at operable units where there is no decision in place. The EPA can only concur on the protectiveness determinations and recommendations for those operable units at which an interim or final ROD has been issued. For this reason, we cannot provide concurrence on the operable units listed on the attached table.

The EPA has reviewed the protectiveness statements for those operable units where decisions are in place. Based on our review, we concur with the U.S. Department of Energy's protectiveness determinations, with the following exceptions:

- We do not concur with the protectiveness statement for the 200-CU-1 (U Plant) operable unit. This protectiveness determination outlined in Section 3.3.5.2.3 is related to the operable units (200-CB-1, 200-CP-1, and 200-CR-1) described in Section 3.3.5 - Canyons and Associated Waste Sites, since there is no decision in place for these operable units. However, a ROD was issued for 200-CU-1, and Section 3.3.5.2 provides enough information to determine protectiveness. Therefore the protectiveness statement should be revised.

- The protectiveness determination for the 300-FF-5 operable unit should also include a statement that exposure pathways that could result in unacceptable risks are being controlled (via Institutional Controls).

The review also identifies actions to be taken that ensure the protectiveness of the selected remedies and ongoing remedial actions and provides a schedule for the completion of the recommended actions. Based on the EPA's review, we concur with the determinations and recommendations identified on Table 1, with the following exception: We do not concur with Issue 1. Issue 1 states: "Permeable reactive barrier test has not been conducted in the upper vadose zone." The non-concurrence is based on the following reasons: The contaminant of concern is not identified; no operable unit is identified; and

the time frame of 09/30/2015 is well past the date that all RODs in the 100 Area are expected to be issued. In general, any tests should be completed during the remedial investigation/feasibility study process to aid in remedy selection.

We request that the DOE provide clarification on the above issues to EPA via letter or errata sheet.

If you have any questions or concerns, please contact me at 509-376-8631 or Christopher Guzzetti of my staff at 509-376-9529.

Sincerely,

Dennis A. Faulk, Program Manager
Hanford Project Office

Enclosure

cc: Russell Jim, Yakama Nation
Gabe Bohnee, Nez Perce Tribe
Stuart Harris, Confederated Tribes of the Umatilla Indian Reservation
Jane Hedges, Washington State Department of Ecology
Ken Niles, Oregon Department of Energy
Susan Leckband, Hanford Advisory Board
Administrative Record: 5-Year Review

Operable Units with no Record of Decision	
100-BC-5	200-EA-1
100-FR-3	200-SW-2
200-OA-1	200-DV-1
200-BP-5	200-CP-1
200-PO-1	200-CR-1
200-IS-1	200-CB-1
200-WA-1	