



COLUMBIA RIVERKEEPER

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Casey Sixkiller  
Director  
Washington Department of Ecology  
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**RE: Next Steps in Implementation of EPA's New Health Standard for Hexavalent Chromium at the Hanford Nuclear Site**

Dear Director Sixkiller,

In August 2024, the U.S. The Environmental Protection Agency (EPA) published the updated IRIS Toxicological Review of hexavalent chromium, updating the original 1998 assessment with the latest data. This new assessment recognizes hexavalent chromium as a mutagenic carcinogen, specifically carcinogenic to humans by the oral route of exposure, thus deriving a cancer slope factor of 0.5 kg-day/mg.

At the Hanford Nuclear Site, previous cleanup studies and plans dealing with hexavalent chromium did not incorporate an oral slope factor for hexavalent chromium in developing cleanup levels. Additionally, the most recent cleanup plan in the River Corridor for the 100-B/C Area used a soil cleanup level of 2 mg/kg and a groundwater cleanup level of 10 µg/L. Using EPA's updated regional screening levels that consider an oral cancer slope factor for hexavalent chromium and the mutagenic effects of hexavalent chromium, cleanup levels must now be adjusted significantly.

The Washington Department of Ecology (Ecology) is a strong advocate for a protective cleanup of Hanford. Continuously, Ecology has set the expectation that the River Corridor at Hanford be cleaned up to an unrestricted use standard, a goal that Columbia Riverkeeper supports.

EPA's change in cancer risk for hexavalent chromium creates large areas of the Hanford site where risks need to be re-analyzed and will likely be above standards for hexavalent chromium. Will Ecology commit to supporting and conducting that re-analysis? Columbia Riverkeeper is concerned that if Ecology doesn't begin to consider new cleanup standards now and start pushing for those, it is unlikely that the River Corridor will have unrestricted use at the end of the cleanup timeline.

Columbia Riverkeeper is also aware that Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) technical staff have started discussions with EPA and Ecology regarding the Cr (VI) soil adsorption coefficient, which has stalled. We encourage Ecology to complete those technical discussions before all other considerations are taken into account and cleanup decisions made.

The Yakama Nation has continuously said that cleanup levels must be lower than what EPA and Ecology have used at Hanford to account for all future uses of the site. While historically contentious, the Tribe's position is more and more in line with new findings from both EPA and Ecology concerning new health concerns with contaminants on site. It is far past time that the Tri-Party Agencies place more trust and think ahead in the ways suggested by Yakama Nation, which would benefit the whole region, averting incomplete and inadequate clean up. With this in mind, Columbia Riverkeeper urges Ecology to push for a delay in proposed River Corridor cleanup plans until both the 100-N and 100-K RI/FS can be updated to include a new risk assessment.

It is up to Ecology to ensure that the U.S. Department of Energy does a real assessment of the risks at Hanford and regulates cleanup activities based on the best scientific information available.

We urge Ecology to continue to be a leader and regional voice for Hanford cleanup, standing up for a cleanup that is protective of all future uses of the Hanford site and a River Corridor that has unrestricted future use. The state of Washington remains more important than ever in our efforts to clean up Hanford.

Thank you for your time and consideration,

Simone Anter

A handwritten signature in dark ink, appearing to read 'Simone', with a stylized flourish at the end.

Staff Attorney & Hanford Program Director  
Columbia Riverkeeper