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Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

MAY 4 1994



94-ERB-110

Mr. Rick George
Confederated Tribes
of the Umatilla Indian Reservation
P.O. Box 638
Pendleton, Oregon 97801

Dear Mr. George:

RESPONSE TO COMMENTS FROM THE CONFEDERATED TRIBES OF THE UMATILLA INDIAN RESERVATION ON THE PROPOSED HANFORD ENVIRONMENTAL RESTORATION DISPOSAL FACILITY (ERDF)

The Tri-Party agencies appreciate your comments and interest in the ERDF. We have identified the following facility-specific issues taken from a letter received on February 25, 1994, (CTUIR ltr. to Tri-Parties from Rick George, "Scoping Issues for ERDF" dtd. February 18, 1994): 1) appropriateness of the ERDF as a pilot project for National Environmental Policy Act (NEPA)/ Comprehensive Environmental Response, Compensation, and Liability Act integration and application of NEPA; 2) follow Future Site Uses Working Group recommendations; 3) protection of groundwater; 4) protection of shrub-steppe habitat and wildlife species/mitigation; 5) protection of cultural resources; and 6) public involvement plan, consultation with Confederated Tribes of the Umatilla Indian Reservation (CTUIR).

Our response to these issues is provided in the attached responsiveness summary. We recognize that your concerns reflect a genuine interest in protecting and restoring the environment.

The Regulatory Package for the ERDF is scheduled to be released for public review on June 27, 1994. The package will be provided to the CTUIR for review and comment once the U.S. Department of Energy has received the final draft, prior to June 27, 1994. The Regulatory Package will consist of the necessary documentation to objectively evaluate the proposed facility. Again, we appreciate your comments and desire to consult with you in the near future to further discuss both the ERDF and the Columbia River Columbia River Comprehensive Impact Assessment. Please contact us to finalize a time and location for this consultation. Our purpose is to continue to strive to keep you informed on the progress of these environmental restoration efforts.

Sincerely,

K. Michael Thompson, Acting Director
Environmental Remediation Division

END:BLF

Attachment

cc: See page 2

94-13292-0249
8420-7625146

Mr. Rick George
94-ERB-110

-2-

MAY 4 1994

cc w/o attach:
B. Burke, CTUIR

cc w/attach:
N. Cadoret, PNL
N. Hepner, Ecology
P. Innis, EPA
M. Janaskie, EM-442
F. Roeck, WHC
J. Wilkenson, CTUIR
Admin Record (ERDF), H6-08

94-7292-0219

CULTURAL RESOURCES REPORT NARRATIVE

HANFORD CULTURAL RESOURCES LABORATORY

A. NAME AND FULL DESCRIPTION OF THE PROPOSED UNDERTAKING

Project Number: 93-200-001
Project Name: Environmental Restoration Disposal Facility (ERDF)

The Environmental Restoration Disposal Facility (ERDF), located on the Hanford Site (managed by the Department of Energy) will provide the disposal site for the waste exhumed during the Hanford Site CERCLA and RCRA cleanup actions. Excavations at the site will be extensive and may be up to 12 m deep. The exact site boundaries have not yet been set, however, the proposed site area currently measures about 10.6 km² (see Figure 1). Since the survey was completed in the summer of 1993, the site boundary has moved about 0.5 km to the east. We surveyed approximately 11.0 km².

B. LOCATION AND GENERAL ENVIRONMENTAL SETTING

The project area is located within the Hanford Site in south central Washington State (see Figure 2) within the Cold Creek Valley in an area locally known as the 200 Area Plateau. The surface topography is low-relief stabilized and semiactive dunes composed of fine sand and silt. The land surface slopes gently to the southwest with elevations ranging from 192 m (630 ft) above mean sea level (asl) to 229 m (750 ft) asl; the overall gradient is 0.08. The proposed site is located in T12N, R26E in Sections 7, 8, 16, 17, 18, 19, and 21. The closest source of perennial water is Rattlesnake Springs, which is located approximately 8 km southwest of the project area.

The area is largely undisturbed. Disturbances include gravel pits, roads, wells and well pads, other pits measuring about 30 m in diameter by about 5 m deep, a laydown yard, and a dump site.

The vegetation is a steppe-shrub community (Daubenmire 1970) dominated by big sagebrush (*Artemisia tridentata*) with an understory of grasses and forbs. Plant species identified during the summer survey within the proposed project area are tallied in Table 1.

Table 1. Plant species within the ERDF project area.

	<u>Scientific name</u>	<u>Common name</u>
shrubs	<i>Artemisia tridentata</i>	big sage
	<i>Chrysothamnus nauseosus</i>	gray rabbitbrush
	<i>Chrysothamnus viscidiflorus</i>	green rabbitbrush
	<i>Grayia spinosa</i>	spiny hopsage
	<i>Purshia tridentata</i>	bitter-brush
	<i>Leptodactylon pungens</i>	prickly phlox
annual grasses	<i>Bromus tectorum</i>	cheat grass
	<i>Festuca octoiflora</i>	sixweeks fescue
perennial grasses	<i>Koeleria cristata</i>	prairie junegrass
	<i>Oryzopsis hymenoides</i>	indian ricegrass
	<i>Poa sandbergii</i>	Sandberg's bluegrass
	<i>Sitanion hystrix</i>	bottlebrush squirreltail
	<i>Sporobolus cryptandrus</i>	sand dropseed
	<i>Stipa comata</i>	needle-and thread grass
annual forbs	<i>Ambrosia acanthicarpa</i>	bur ragweed
	<i>Centaurea sp.</i>	knapweed
	<i>Cryptantha circumscissa</i>	matted cryptantha

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CULTURAL RESOURCES REPORT NARRATIVE

Project Number: 93-200-001
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	<i>Descurainia pinnata</i>	tansy mustard
	<i>Descurainia sophia</i>	flixweed
	<i>Epilobium paniculatum</i>	tail willowherb
	<i>Eriogonum vimineum</i>	broom buckwheat
	<i>Holosteum umbellatum</i>	jagged chickweed
	<i>Lactuca serriola</i>	prickly lettuce
	<i>Microsteris gracilis</i>	pink microsteris
	<i>Salsola kali</i>	Russian thistle
	<i>Sisymbrium altissimum</i>	tumblemustard
biennial forbs	<i>Thelypodium laciniatum</i>	cutleaf lady'sfoot mustard
	<i>Tragopogon dubius</i>	yellow salsify
perennial forbs	<i>Achillea millefolium</i>	yarrow
	<i>Arenaria franklinii</i>	Franklin's sandwort
	<i>Astragalus spp.</i>	milkvetch
	<i>Balsamorhiza careyana</i>	Carey's balsamroot
	<i>Calochortus macrocarpus</i>	sagebrush mariposa lily
	<i>Chaenactis douglasii</i>	hoary chaenactis
	<i>Comandra umbellata</i>	toad flax
	<i>Crepis atrabarba</i>	slender hawksbeard
	<i>Cymopterus terebinthinus</i>	turpentine cymopterus
	<i>Erigeron spp.</i>	fleabane
	<i>Lygodesmia juncea</i>	skeletonweed
	<i>Machaeranthera canescens</i>	hoary aster
	<i>Oenothera pallida</i>	pale evening-primrose
	<i>Orobanche corymbosa</i>	flat-topped broomrape
	<i>Phlox longifolia</i>	longleaf phlox
	<i>Penstemon acuminatus</i>	sand beardtongue
	<i>Opuntia polyacantha</i>	starvation pricklypear
	<i>Phacelia hastata</i>	whiteleaf scorpionweed

Ground visibility ranged from 100 % in blowouts to 10 % under shrubs and in disturbed areas. The average ground visibility was approximately 65 %.

Wildlife or their sign observed in the project area is listed in Table 2. Mice burrows were also noted.

Table 2. Animal species observed/inferred within the ERDF project area.

birds	<i>Chordeiles minor</i>	common nighthawk
	<i>Sturnella neglecta</i>	western meadowlark
	<i>Hirundo rustica</i>	barn swallow
	<i>Amphispiza belli</i>	sage sparrow
	<i>Zenaidura macroura</i>	mourning dove
	<i>Circus cyaneus</i>	northern harrier
	<i>Lanius ludovicianus</i>	loggerhead shrike
	<i>Asio flammeus</i>	short-eared owl
	<i>Athene cunicularia</i>	burrowing owl
	<i>Larus sp.</i>	gull
reptiles	<i>Uta stansburiana</i>	side-blotched lizard

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	<i>Pituophis melanoleucus</i>	gopher snake
	<i>Phrynosoma douglassi</i>	short-horned lizard
mammals	<i>Canis latrans</i>	coyote
	<i>Odocoileus hemionus</i>	mule deer
	<i>Lepus californicus</i>	black-tailed jackrabbit
	<i>Taxidea taxus</i>	badger

Nests of loggerhead shrikes and common nighthawks were observed, as well as a possible northern harrier nest.

Aerial photograph(s): EG&G 5673, exp. 105, 05-07-87, 1:19900

USGS topographic map(s): USGS 7.5' Gable Butte Quad, 1986 edition

Legal description: Project to be located in T 12 N R 26 E parts of Section(s) # 7, 8, 9, 16, 17, and 18. Survey occurred in T. 12 N. R. 26 E. parts of Section(s) # 7, 8, 9, 16, 17, 18, 19, 20, and 21.

UTMs: Corners of area surveyed (see Figure 1).

<u>Map Reference Point</u>	<u>Zone</u>	<u>m Northing</u>	<u>m Easting</u>
A	11	5157610	299950
B	11	5157520	303000
C	11	5154070	302980
D	11	5154420	300360
E	11	5154430	299500
F	11	5157010	299520
G	11	5157000	299810
H	11	5157200	299810
I	11	5157190	299940

C. PRE-FIELD RESEARCH

1. Sources of information checked: Survey and Site Location Maps Previous Reports Aerial Photographs GLO Plats Other

2. Summary of previous studies in this general area, similar terrain: A literature and records review showed that four surveys had been previously conducted by the HCRL within the proposed project area; HCRC #89-200-023, HCRC# 93-600-004, HCRC-93-600-016, and BERC 010. One isolated artifact, a cobble tool (HI-89-016), was located within the project area. The tool was not collected. Six surveys have been previously conducted by the HCRL within 0.8 km (.0.5 miles) of the proposed project area; HCRC #89-600-010, HCRC #93-600-001, HCRC #93-600-005, HCRC #93-600-014, HCRC #93-600-023, and Plot 797 SD

<u>Report No./Title</u>	<u>Distance/Direction</u>	<u>Results</u>
HCRC #89-200-023	Within proposed ERDF boundary	HI-89-016, an isolated cobble tool
HCRC #89-600-010	0.6+ km to the northeast of the northeast corner	No cultural resources identified
HCRC #93-600-001	Adjacent to 0.5 km north of the northern boundary	No cultural resources identified

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CULTURAL RESOURCES REPORT NARRATIVE

Project Number: 93-200-001
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HCRC #93-600-004	Adjacent to the northwest corner	No cultural resources identified
HCRC #93-600-005	Adjacent to the northern boundary	No cultural resources identified
HCRC #93-600-014	Immediately adjacent to the western boundary	No cultural resources identified
HCRC #93-600-016	Partially within the proposed ERDF boundary	No cultural resources identified
HCRC #93-600-023	0.5 km north of the northern boundary	No cultural resources identified
BERC 010	Within proposed ERDF boundary	No cultural resources identified
Plot 797 SD	0.4 km south of southwest corner of proposed ERDF boundary (as of July 1993)	No cultural resources identified

D. EXPECTED HISTORIC AND PREHISTORIC LAND USE AND SITE SENSITIVITY

1. Are there known sites in the general area? Yes No
2. Are sites expected? Yes No

A trail was mapped on the 1880 General Land Office Survey map (GLO) in the southern part of the proposed ERDF area, and it is presumed that this area was used by both Native Americans and EuroAmericans. Very few prehistoric sites are found this far from permanent water, however, isolated prehistoric artifacts and historic trash scatters are expected. Isolated prehistoric artifacts have previously been found in the vicinity of historic trails on the Hanford Site, and historic trash scatters are common on site.

E. FIELD METHODS

1. Areas examined and type of coverage: An intensive pedestrian survey was conducted for the project covering 11.0 km², following procedures in Chatters 1989. Intensive survey entailed pedestrian search in transects spaced 20 m apart. Participants scanned an area 5 m to either side of the transect center line, thus having potential for 100% discovery of concentrations of surface artifacts larger than 10 m in diameter, as well as most smaller concentrations. The lowest estimated discovery rate, at 50%, was expected for single, isolated artifacts. All survey transects were oriented north/south, except for a few transects in the northwest corner of the survey area which were oriented east/west.

2. Areas not examined and reasons why: A dump area measuring approximately 0.13 km² in the northwest corner of the proposed ERDF site was not surveyed because of safety concerns. Buckets, wire, wood, and metal barrels were observed from the perimeter of the dump. The age and contents of the dump site is unknown but it may date to the construction or early operations at the 200 West area of the Hanford Site. Most of this area appears disturbed from examination of aerial photographs.

3. Personnel conducting and assisting in this survey: N. A. Cadoret, M. K. Wright, M. V. Dawson, J. G. Longenecker, R. Bayman, J. Woodruff, J. Pierce, G. Civay, J. Myer, W. McIntire

4. Date(s) of survey: 7/21-9/10/93

5. Visibility on surface: Estimate:> 65 %

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Visibility of subsurface: Estimate:< 5 %

6. Problems encountered: None

F. RESULTS

1. All cultural resources recorded for this area: None

During the survey, four archaeological sites, one paleontologic site, and nine isolated artifacts were recorded and are listed below. One of the recorded sites was of Native American origin with a historic/modern component, one was a paleontologic site of indeterminate age, and three were historic sites, dating to the beginning of this century. Some artifacts were collected. Also listed below is the isolated cobble tool found within the project area in 1989.

<u>HCRL Isolate No.</u>	<u>Description</u>	<u>Collected?</u>
HI-89-016	cobble tool	no
HI-93-001	rod	yes
HI-93-002	two flakes	yes
HI-93-004	bottle	yes
HI-93-005	can	yes
HI-93-006	flake	yes
HI-93-007	can	yes
HI-93-009	can	yes
HI-93-010	flake	yes
HI-93-012	rod	yes

<u>HCRL Site No.</u>	<u>State No.</u>	<u>Site Type/description</u>	<u>Collected?</u>
HP-93-001	Not assigned	tooth enamel	yes
HT-93-080	Not assigned	two flakes and tooth enamel, historic/modern debris	yes
HT-93-081	Not assigned	jar fragments	no
HT-93-083	Not assigned	collapsed structure	no
HT-93-084	Not assigned	stove/cans	no

HP-93-001: This information sensitive and has been deleted. The site fails to meet any of the criteria necessary for listing on the National Register of Historic Places (National Register). There is no indication that the site is of human origin. Additionally, the site is not unique and the research potential of the site has been exhausted through collection.

HT-93-080: This information sensitive and has been deleted. The site fails to meet any of the criteria necessary for listing on the National Register. The research potential of the prehistoric component of the site has been exhausted through recordation and collection. The historic/modern component holds no unique characteristics and does not retain nationally significant information.

HT-93-081: This information sensitive and has been deleted. The site fails to meet any of the criteria necessary for listing on the National Register. The site holds no unique characteristics, many such historic trash scatters are located on the Hanford Site, and does not retain nationally significant information.

HT-93-083: This information sensitive and has been deleted. By itself, the site does not retain nationally significant information. However, viewed in a broader historic context, Euro-

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CULTURAL RESOURCES REPORT NARRATIVE

Project Number: 93-200-001
Project Name: Environmental Restoration Disposal Facility (ERDF)

American ranching in southeastern Washington, the site represents a single part of the greater archaeological record, and may be considered regionally or locally significant viewed in this context.

HT-93-084: This information sensitive and has been deleted. By itself, the site does not retain nationally significant information. However, viewed in a broader historic context, Euro-American ranching in southeastern Washington, the site represents a single part of the greater archaeological record, and may be considered regionally or locally significant viewed in this context.

2. Cultural resources noted but not formally recorded: Isolated milk/sanitary cans, modern artifacts, dump sites, and probable military sites from the late 1950s and 1960s were noted but not recorded.

<u>Map designation</u>	<u>Description</u>
a	Large cylindrical metal tank on platform constructed of railroad ties. The tank measures 1.5 m diameter by 2.1 m long. The platform measures 2.5 m long by 2.3 m wide by 1.1 m tall. A well with a metal casing with a diameter of 15 cm is located adjacent to the tank. Probable water tank, perhaps related to military operations in the 1950s and 1960s.
b	Large cylindrical metal tank on platform constructed of railroad ties. The tank measures 4.5 m long and is covered with tar. The ends are metal and painted green. A green glass, 10 oz., crown cap beverage bottle was found nearby. Probable water tank, perhaps related to military operations in the 1950s and 1960s.
c	Large cylindrical metal tank on platform constructed of railroad ties. The metal tank is adjacent of a semisubterranean, 2.2 m diameter concrete tank which is about 4.5 to 6.0 m deep. This tank is covered with three circular openings in the top. Diameters of these openings measure 0.25 m, 0.4 m, and 0.43 m. A collapsed, three-hole outhouse is located 24 m north of the metal tank. An aluminum flag pole is located on a dune crest close by. Probable military site.
d	Large cylindrical metal tank on platform constructed of railroad ties. Well and bucket adjacent. Probable water tank, perhaps related to military operations in the 1950s and 1960s.
e	Military dump containing cans, including food, poison, milk, oil, and solvent cans, "HEEP GOOD" and "Coca Cola" soft drink bottles, metal binding straps, wire nails, 5 gallon metal drum, partly buried, batteries.
f	Based on the proximity of the site to the 200 West area, the debris is probably associated with the construction or operations of the Hanford Site. Debris includes wooden benches, a wooden tool box, wire nails, buckets, wire including electrical wire, metal flashing, 1/8" mesh screening in a wooden frame., asbestos (?) siding, concrete fragments, ceiling tiles, canvas fragments, black rubber hose, shovel head, and a 5 gallon paint can.
g	Probable laydown yard associated with the construction of Hanford facilities. Debris includes many pieces of lumber, possible structural remains, sidewalks, wire cable, buckles, air filter, metal fasteners, concrete rubble, disused asphalt road, and aluminum flashing. The ground has been disturbed, furrows are visible.
h	3200 m arc road and remains of air samplers along the road which were used from 1960-1974 for atmospheric dispersion tests (Nickola et al 1983)

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Project Number: 93-200-001
Project Name: Environmental Restoration Disposal Facility (ERDF)

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- i Isolated milk can measuring 2 15/16" in diameter by 3 3/4" tall dating to 1917-1929 (Simonis n.d.)
 - j Isolated sanitary can measuring 6 5/8" in diameter by 7 3/4" tall, knife-puncture opening, therefore held some kind of liquid.
 - k Four lubricant cans measuring 11" in diameter by 13 1/4" tall with a 2" diameter screw top opening, and a sanitary can measuring 6 1/2" in diameter by 7 3/4" tall. All cans are army green.
 - l Sanitary can measuring 2 5/8" diameter by 3 1/4" tall.
 - m Wooden construction, perhaps for holding a sign.
 - n 6 oz. Coca Cola bottle embossed with "TACOMA WASH L-C"-collected.
 - o Crushed sanitary can measuring 2 3/4" : diameter by 3 3/8" tall.
 - p Galvanized tub measuring 5 3/4" tall, diameter of base 14", upper diameter 17". Tub has handles and a 1" rim.
 - q Clear glass, continuous thread bottle with "PEPSODENT ANTISEPTIC Duraglas" on the base.
 - r Sanitary can measuring 5 1/8" diameter by 5 5/8" tall. Lid half opened with can opener and bent back.
 - s Milk can measuring 2 15/16" diameter by 4 3/8" tall. The can dates to 1917-1929 (Simonis n.d.)
 - t Debris from burnt structure including a green lamp fixture, metal door and lock and knob, stove pipe, metal heater, window glass. Large chunks of charcoal and melted glass suggests a hot fire. Undoubtedly dates to Hanford Operations.
 - u Sanitary can measuring 2 15/16" diameter by 4 3/8" tall, opened with blade and bent back, hole cut in center of the bottom with a blade.
 - v Brown, crown cap, beer? bottle measuring 2 1/2" diameter by 6 1/4" tall. Embossing on the base reads "4606 G 20 0 13"
 - not mapped car jack
 - not mapped Sanitary can measuring 4" in diameter and 4 5/8" tall, top opened with a blade and bent back.
 - not mapped Milk can measuring 2 15/16" in diameter by 3 7/8" tall, two round punch hole openings. The can dates to 1917-1929 (Simonis n.d.)
 - not mapped Milk can measuring 2 15/16" diameter by 3 15/16" tall. Two small round punctures on can end. Can dates to 1917-1929 (Simonis n.d.)
 - not mapped Sanitary can measuring 3 7/16" diameter by 3 1/2" tall, opened with a blade and lid bent back, however, solder at one end appears to be the attachment point for a key.
 - not mapped Steel beverage can measuring 4 13/16" by 2 11/16", opened with a church key.
 - not mapped Sanitary can measuring 5" diameter by 6 1/2" tall.
 - not mapped Jack for car/truck

Repository (for all original survey records, photos, maps, and artifacts):

All original records, maps, etc. are stored at the Hanford Cultural Resources Laboratory in Richland, Washington.

G. CONCLUSIONS AND RECOMMENDATIONS:

Sites HP-93-001, HT-93-080, and HT-93-081 do not meet any of the criteria for listing on the National Register of Historic Places. The research potential of these sites and of all but one of

CULTURAL RESOURCES REPORT NARRATIVE

Project Number: 93-200-001
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the isolates has been exhausted through recordation and collection. Sites HT-93-083 and HT-93-084 by themselves, do not retain nationally significant information. However, viewed in a broader historic context, Euro-American ranching in southeastern Washington, the sites represent part of the greater archaeological record, and may be considered regionally or locally significant viewed in this context.

The project will have no effect on any properties eligible for the National Register. The proposed project should have no effect on sites HT-93-083 and HT-93-084 given the most recent site boundaries. If, however, the project intends to use the area including these sites, mitigation may be necessary.

H. REFERENCES

Chatters, J. C. 1989 Hanford Cultural Resources Management Plan, PNL-6942, Pacific Northwest Laboratory, Richland, Washington.

Daubenmire, R. 1970 Steppe vegetation of Washington. Wash. Agric. Expt. Sta. Tech. Bull., 62, 131 pp.

Nicola, P. W., J. V. Ramsdell, C. S. Glantz, R. E. Kerns, 1983 Hanford Atmospheric Dispersion Data: 1960 through June 1967, PNL-4814, Pacific Northwest Laboratory, Richland, Washington.

Simonis, D. Date unknown. Condensed/Evaporated Milk Cans-Chronology for Dating Historical Sites. U.S. Department of the Interior, Bureau of Land Management.

I. ATTACHMENTS

- 1. Site forms for each site recorded? [X] Four archaeological site forms, one paleontological site form
2. Isolate forms for each isolate recorded? [X] Ten isolated artifact forms
3. Overview location map [X]
4. Quad map of surveyed area? []
5. Other attachments? [X] Project area sketch map based on USGS 7.5 * Gable Mountain Quad Map.

Site and Isolate forms are not included in this version of the report narrative.

J. CERTIFICATION OF RESULTS

I certify that I conducted the investigation reported here, that my observations and methods are fully documented, and that this report is complete and accurate to the best of my knowledge.

Reporter: N.A. CADORET

Signature: [Handwritten Signature]

Date: 2/3/94

Reviewer: M.K. Wright

Concurrence (Signature): M.K. Wright

Date: 2-3-94

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CULTURAL RESOURCES REPORT NARRATIVE

Project Number: 93-200-001
 Project Name: Environmental Restoration Disposal Facility (ERDF)

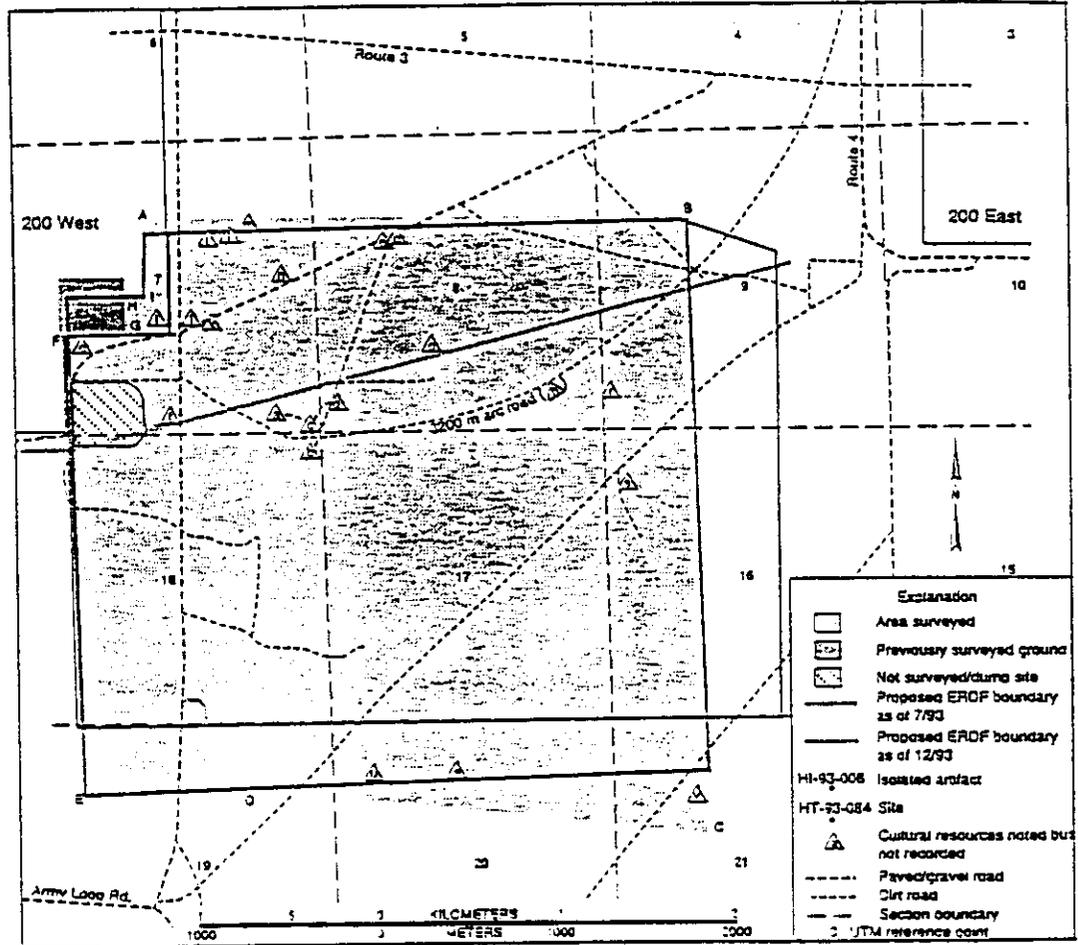


Figure 1. Project area map (base map USGS Gable Butte Quadrangle, Washington, 7.5 Minute Series (T 12 N, R 26 E)). Site and isolate locations have been deleted from the map.

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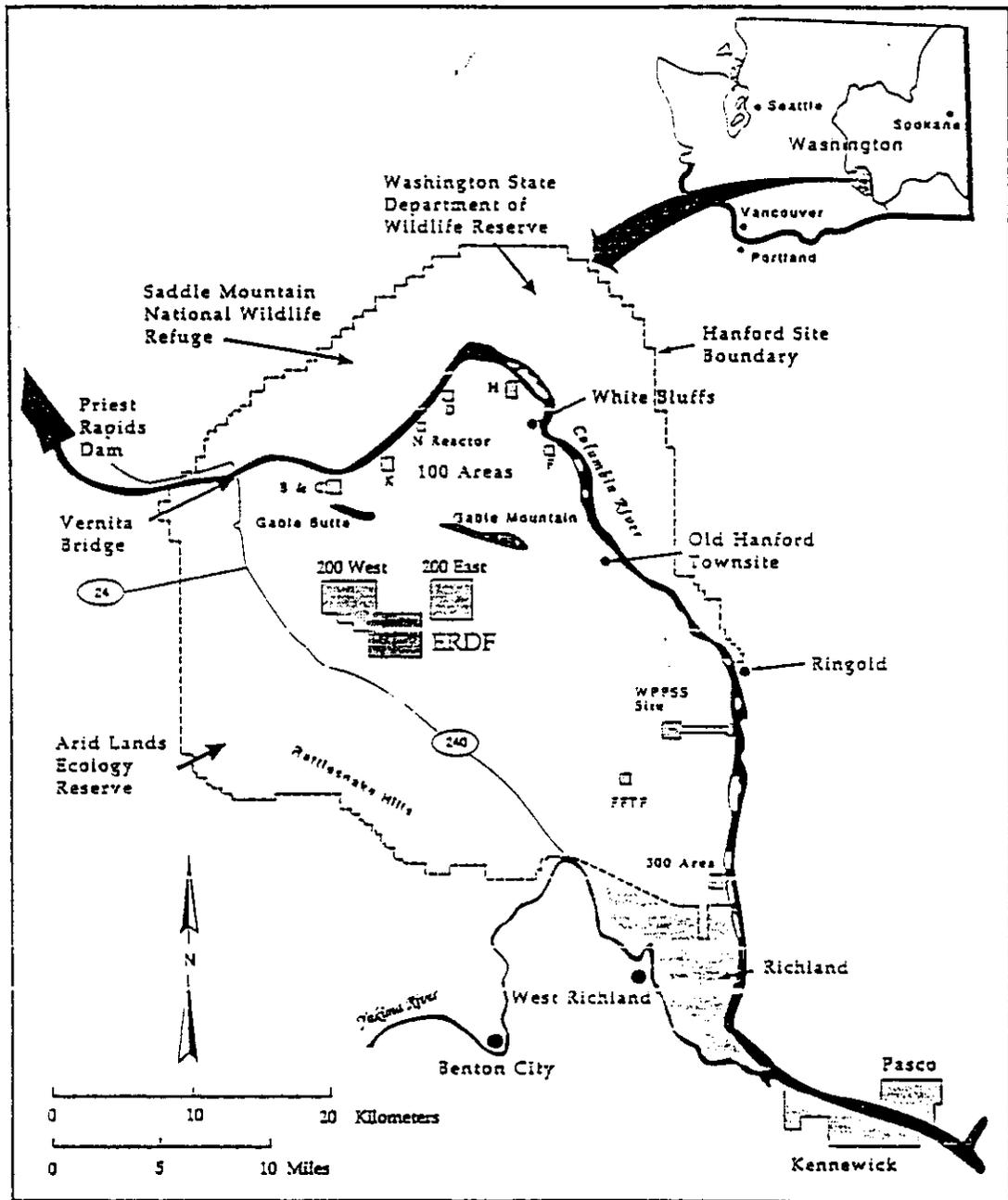


Figure 2. Location of Project on the Hanford Site.

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RESPONSIVENESS SUMMARY
ENVIRONMENTAL RESTORATION DISPOSAL FACILITY (ERDF)

- 1) **Appropriateness of the ERDF as a Pilot Project for National Environmental Policy Act (NEPA)/Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Integration and Application of NEPA.**

The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) is concerned about the roles of the CERCLA and NEPA processes for the ERDF project. During the recent Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) negotiation (concluded in January 1994), the Tri-Parties agreed to minimize duplicative processes and speedup remediation. The Tri-Parties agreed that the ERDF project could be identified as a CERCLA operable unit and evaluated using the CERCLA Remedial Investigation/Feasibility Study (RI/FS) process since it is an essential part of CERCLA remedial activities. However, to ensure that the project could comply with the substantive portions of NEPA, the ERDF has employed a pilot project concept to demonstrate that the CERCLA process can be made equivalent to NEPA. CERCLA will be the implementing mechanism for the ERDF facility and NEPA elements will be addressed and included in the Regulatory Package. More importantly, the Tri-Parties are committed to remediation and believe that eliminating duplicative procedures will allow remediation to proceed in a more expeditious and cost-effective manner. When a CERCLA Record of Decision is issued, the ERDF would be able to accept CERCLA remediation waste. For the Resource Conservation and Recovery Act (RCRA) remediation waste, a modification to the Hanford Facility Dangerous Waste Permit is required.

- 2) **Follow Future Site Uses Working Group (FSUWG) Recommendations.**

The Hanford FSUWG recommendations were taken in to consideration with regard to siting the proposed ERDF. The ERDF alternative using the least amount of land will be presented as the preferred alternative in the Regulatory Package. This burial trench would only be expanded as the Hanford Site remediation progresses. The total area disturbed by the ERDF (without allocation for contingency) would be reduced to approximately 1.6 square miles, which fits within the exclusive zone as established by the FSUWG. This is a direct result of the evolving trench engineering design concept which allows a significant decrease from the original estimate of 6.12 square miles. While the 1.6 square mile figure does not include contingency space, it is believed that the 1.6 square miles would support the current waste volume estimate of 28 million cubic yards of remediation waste.

There was a request by the public that the 200 BC control area, a surface contaminated site, be considered for siting the ERDF. Based on this comment from the public, an independent study considered the 200 BC control area as a potential site. While the study shows both advantages and disadvantages, it concludes that the disadvantages significantly outweigh the benefits of adopting the 200 BC control area as the preferred site. In summary, the study states that the 200 BC control

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area should not be chosen as the primary site for the following key reasons: 1) existing contamination causes inherent difficulty with monitoring facility performance during operations and after closure; 2) contaminated surface soils from the 200 BC Area would have to be double handled and will increase contamination exposure to personnel and environment; 3) increased cost of performing work in a contaminated area and the potential problems associated with personnel working in a contaminated area; and 4) switching the preferred site to the 200 BC control area would substantially delay remediation along the Columbia River.

3) **Protection of Groundwater.**

The Regulatory Package for the ERDF will present much of the information requested with regard to groundwater monitoring. More specifically, the Corrective Action Management Unit (CAMU) Rule application for the ERDF will discuss in as much detail as possible, the monitoring well network relative to both the ERDF CAMU and the existing groundwater contaminant plumes. One may also find information regarding protection of groundwater in the RI/FS document which is also part of the Regulatory Package for the ERDF.

4) **Protection of Shrub-steppe Habitat and Wildlife Species/Mitigation.**

The CTUIR is concerned with the decline of native shrub-steppe habitat in Washington State and the lack of a specific U.S. Department of Energy (DOE) Plan for Management of this disappearing resource. Discussions have been initiated between representatives of the DOE Richland Operations Office (RL), the U.S. Department of the Interior, and the Washington State Department of Fish and Wildlife to develop and implement a biological resource management plan. We hope that the CTUIR will participate in development of this plan.

In addition to the flora and fauna inventory accomplished on the preferred site in the Spring of 1993, a comprehensive environmental baseline survey of the ERDF primary site will be completed.

5) **Protection of Cultural Resources.**

Given the reduction of the footprint of the proposed ERDF to 1.6 square miles, the Cultural Resources Survey considered a majority of the preferred site. However, in reducing the footprint of the proposed site, an additional less than one-half square mile portion of the site remains to be surveyed. That activity is scheduled to happen in the Summer of 1994. As requested, a copy of the cultural resources report for the proposed ERDF is provided as enclosure 1 to this attachment. The report outlines the methodology and information collected during the actual survey.

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6) **Public Involvement Plan, Consultation with Confederated Tribes of the Umatilla Indian Reservation.**

RL's Environmental Restoration program desires direct consultation with the CTUIR to further discuss the ERDF. As requested, a copy of the Public Involvement Plan for the ERDF is being provided as enclosure 2 to this attachment.

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**Environmental Restoration Disposal Facility
Hanford Federal Facility Agreement and Consent Order
Target Milestone M-07-00-T01**

**PUBLIC INVOLVEMENT PLAN
Revision 1**

January 1994

BACKGROUND

Hanford has large amounts of contaminated material from old burial and discharge sites. The Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) calls for remediation of these sites. If removal of contaminants is the selected remedy for 100 and 300 Area operable units, large volumes of radioactive and mixed waste and some hazardous waste would be generated beginning approximately September 1996. A facility capable of receiving large quantities of these wastes would be needed at Hanford at that time. Preliminary analysis indicates that technology may not exist to destroy the majority of these wastes and offsite disposal is not cost effective or acceptable for many reasons (e.g., transportation of massive quantities of waste on public highways).

The Hanford Future Site Uses Working Group in the report "The Future for Hanford: Uses and Cleanup," December 1992, recommends that waste management activities at the Hanford Site be concentrated in the interior portion of the Central Plateau. The content of this report is being considered as the three agencies undertake this project. The State of Washington Department of Ecology (Ecology), the U.S. Environmental Protection Agency (EPA), and the U.S. Department of Energy (USDOE) agree to proceed with the steps necessary to design, approve, construct and operate such a disposal facility, known as the Environmental Restoration Disposal Facility (ERDF).

In recent negotiations for the Tri-Party Agreement, milestones were set for this facility. This public involvement plan meets a milestone agreed to in the negotiations. (See attached negotiated milestones.)

Public involvement for the ERDF will be coordinated with activities for other Tri-Party Agreement activities and other programs affecting the Environmental Restoration program as much as possible. The ERDF will be kept within the context of the whole remediation program rather than a separate activity. The Hanford Advisory board will provide input and assist where appropriate.

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DECISION MAKERS

Currently, an integrated management organization is being developed to coordinate the many decisions needed to put the facility in place. This organization will include participation from EPA, Ecology, USDOE, the Westinghouse Hanford Company, the U.S. Army Corps of Engineers. They will consider and use input from the public. Public input will be critical throughout the process.

DECISION-MAKING PROCESS

The final decision, to be made at the end of this public involvement process, is whether and what kind of facility is needed for low-level and mixed wastes, how the facility will be designed, what wastes will be sent to the facility, and where the facility will be located. Each of these are components for the successful implementation of the ERDF.

A pilot project concept for National Environmental Policy Act (NEPA)/Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) integration (functional equivalency) will be utilized; additional or separate NEPA process and documentation will not be required. USDOE will develop a "regulatory package" to consist of a CERCLA proposed plan, a Resource Conservation and Recovery Act (RCRA) Corrective Action Management Unit (CAMU) permit application, and technical documentation (Remedial Investigation/Feasibility Study [RI/FS]) to support each of these documents. Additionally, this package will incorporate NEPA values typically associated with an environmental impact statement (EIS).

The RI/FS and proposed plan will analyze potential options for an ERDF and evaluate whether these options are consistent with the CERCLA remedial action criteria. The RCRA CAMU unit application will provide information and analysis to allow a determination of whether the proposed facility will meet the CAMU requirements under RCRA. An index will be included in the regulatory package to indicate where NEPA values are documented. The index will point to such items as: the estimate of potential cumulative impacts associated with the ERDF operations (including relevant impacts from other past, present, and reasonably foreseeable activities in the vicinity); consideration of socio-economic factors; biological and cultural resources; etc. Pollution prevention and waste minimization measures will be factored into the alternatives to be analyzed. These documents will be accompanied by appropriate supporting technical documentation.

The Department of Ecology has made a determination of significance under the State Environmental Policy Act (SEPA) for ERDF. Ecology will use the regulatory package to meet the requirements of an EIS.

The following information describes the scope of the facility as DOE, EPA, and Ecology discussed in the recent Tri-Party Agreement negotiations.

The proposed facility: The proposed facility would accommodate radioactive and mixed wastes (including contaminated, decontamination, and decommissioning waste) from past-practice site remediation activities performed by the

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Environmental Restoration program. Newly generated waste would not be accepted in the ERDF. Neither would the facility accept waste generated outside the Hanford boundaries.

A phased approach is proposed for construction of the facility. Design and construction of the initial phase would be adequate for disposal of waste volumes projected to result from 100 and 300 Area Records of Decision (RODs) for operable units presently under investigation. Incremental future expansion of the facility would be maintained such that remedial action schedules were not adversely impacted by inadequate Hanford waste capacity. Since the facility will require significant funding and operational resources, a phased approach would minimize impacts on other operations such as remediation. A phased approach will minimize the land use requirement since disposal units will be brought on line on an "as needed basis."

In recognition of the Future Site Uses Working Group, only a preferred site on the Central Plateau is being considered.

Regulatory approach: The proposed approach is to proceed with a CERCLA ROD for a CAMU facility under the Hazardous and Solid Waste Amendment using the CAMU rule promulgated by EPA in April. Generally, this rule allows the facility owner/operator to meet performance based standards for the design, construction and operation of the facility tailored to site specific circumstances.

The DOE shall prepare a comprehensive "regulatory package" to evaluate the proposed facility. The package shall address the criteria listed in 40 CRC 264.552(c) for CAMU designation and a CERCLA ROD. Each corrective action site will issue a Site-Wide Permit Modification that will specify how the waste from that Operable Unit will be treated and disposed.

Schedule: Timing for the facility is critical. The proposed plans for the operable units are due beginning in October 1994. Delay in construction of a facility would impact remediation of the waste sites. The three parties are committed to working together to resolve issues affecting the design, construction, and operation of the facility and to maintain the schedule to support the remediation program.

The four steps in the decision-making process are as follows:

1. Define the scope of the ERDF and generate alternatives for consideration. During this step, DOE will issue a Public Notice regarding preparation of a regulatory package to evaluate the ERDF.

Public Involvement Objectives:

- Ensure that the public is informed of the need for finding a suitable facility for large volumes of low-level waste, like soil, in accomplishing Tri-Party Agreement remediation actions.
- Identify concerns and issues about the proposed facility.

- Determine appropriate alternative issues to be evaluated in the regulatory package.
- Assess the participation needs of the stakeholders.

Targeted Stakeholders:

The **stakeholders** are defined as local citizen and governmental interests; local business interests; local environmental interests; labor/work force interests; regional environmental, citizen, and other public interests; regional business interests; public health interests; the State of Oregon and its interested citizens and people who are highly interested in Hanford issues and participate in the Tri-Party Agreement public meetings.

Information to be Communicated to Stakeholders:

- The need for a facility for low-level and mixed wastes.
- The types of wastes that could be included in such a facility.
- The regulatory decision-making processes applicable to the ERDF.
- How the stakeholders will be involved in the decision.

What We Need to Learn from Stakeholders:

- Do they understand the need for such a facility? What additional information do they need to help with this decision?
- What are the problems they perceive regarding this facility?
- What should EPA, Ecology, and USDOE include in the scope of their study for this facility?
- What alternatives should be considered concerning this facility?
- What facility design is appropriate for radioactive and mixed wastes?
- What options other than the proposed option should be considered?
- Are there tradeoffs between values regarding the siting of this facility that need to be considered?
- What are other concerns regarding progression of plans for this facility? Are there other issues with this facility?
- Does the public involvement process appear adequate?

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Public Involvement Activities:

Some information has already been shared with stakeholders concerning this project. The issue was included in a break-out group at the February 1993 Tri-Party Agreement public meeting held in Pasco. Articles about the ERDF were published in the April 1993 and August 1993 issues of the *Hanford Update*. Discussion of the ERDF was included in the May 1993 and August 1993 Hanford cleanup meetings concerning all negotiation items. Ecology held a meeting September 10, 1993, with stakeholders to discuss the ERDF and invited EPA and USDOE.

The following additional activities will be conducted:

- Develop background material on remediation wastes at Hanford, information on the facility, issues regarding the construction of such a facility, and proposed issues relating to siting of the facility. This focus sheet should outline the Tri-Party Agreement negotiations including target schedule and regulatory package for coordinating CERCLA and RCRA requirements. Distribute background material to the highly interested mailing list, any other citizens identified as interested in the ERDF and those individuals who request information throughout the process.
- Hold a public comment period for receiving scoping comments. Hold scoping meetings in the Tri-Cities and Seattle to solicit comments on the scope of the facility.
- Issue a press release to regional news media concerning the publication/issuance of the Public Notice and public comment period.
- Inform DOE and regulatory agency employees via employee newsletters or other internal employee information mechanisms.
- Place appropriate articles in the *Hanford Update* to status stakeholders on the public involvement process and progress of this activity. Ideally, the meeting(s) and public comment period notification will be printed in the *Hanford Update*. If the schedule does not allow, the results of the public comment period and subsequent public involvement opportunities will be highlighted.
- As requested and as they fit into the appropriate schedule, provide informational briefings to groups like the Nuclear Waste Advisory Council, Hanford Waste Board, Hanford Advisory Board, special interest groups, and civic organizations to update them on the status of the project and solicit their input.

Estimated Timeframe:

Activities will be coordinated around the Public Notice publication scheduled for December 15, 1993.

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2. Evaluate alternatives for the facility. During this step, DOE will issue the "regulatory package" for review and comment.

Public Involvement Objectives:

- Reach agreement that we have looked at an adequate range of options concerning the facility.
- Ensure that public values, issues, and concerns have been addressed and incorporated as appropriate in the planning process and documents.

Targeted Stakeholders:

The public will broaden, but will still encompass the same as in Step 1.

Information to be Communicated to the Stakeholders:

- A summary of public input received in the activities listed in Step 1, including relevant recommendations from the Future Site Uses Working Group and Tank Waste Task Force.
- An evaluation of the alternatives will be presented in the "regulatory package" (including any response to comment documentation).

What We Need to Learn from the Stakeholders:

- Does the "regulatory package" adequately address the input provided in Step 1?
- What input do you have concerning the facility and regulatory information presented in the "regulatory package?"

Public Involvement Activities:

- Summarize the alternatives in a focus sheet or executive summary that is short and easy to understand. Distribute to the mailing list.
- Hold a public comment period to solicit comments. Conduct hearing(s) during the public comment period to receive comments on the "regulatory package."
- Issue a press release concerning the "regulatory package" and opportunity for public comment. As requested, respond to questions from the media and participate in additional media activities, i.e., tour of the site, radio talk shows, etc.
- Inform DOE and regulatory agency employees via employee newsletters or other internal employee information mechanisms.

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- Place appropriate articles in the *Hanford Update* to status stakeholders on the public involvement process and progress of this activity.
- As requested and as appropriate to the schedule, provide informational briefings to groups like the Nuclear Waste Advisory Council, Hanford Waste Board, Hanford Advisory Board, special interest groups, and civic organizations.

Estimated Timeframe:

Activities will be coordinated around the issuance of the "regulatory package" scheduled for public availability by July 1, 1994.

3. Select the preferred alternative. During this step, the CERCLA ROD will be issued.

Public Involvement Objective:

- Inform public of decision and demonstrate to them that their input was considered in selecting the preferred alternative.

Targeted Stakeholders:

The targeted stakeholders are the same as in Step 2.

Information to be Communicated to the Stakeholders:

- Summary information concerning the alternative selected in the ROD. The ROD will be available to interested members of the public.

What We Need to Learn from the Stakeholders:

- Did we incorporate their values adequately so that the final decision reached in the ROD is acceptable?

Public Involvement Activities:

- Summarize the ROD in a focus sheet. Distribute to all stakeholders.
- Issue a press release concerning the ROD.
- Inform DOE and regulatory agency employees via employee newsletters or other internal employee information mechanisms.
- Place appropriate articles in the *Hanford Update* to status stakeholders on the public involvement process and progress of this activity.

- As requested, provide informational briefings to groups like the Nuclear Waste Advisory Council, Hanford Waste Board, Hanford Advisory Board, special interest groups, and civic organizations.
- Discuss the ROD at Tri-Party Agreement public meetings.

Estimated Timeframe:

The CERCLA ROD is scheduled for completion by September 1994.

4. Implement the remedy selected in the ROD.

Public Involvement Objectives:

- Keep the stakeholders informed of progress on the construction and operation of the ERDF.

Estimated Timeframe:

- Construction is scheduled to begin October 1994 with operations to begin in September 1996.

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