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Trustee Communications Plan for the Columbia River Component of the River Corridor Baseline Risk Assessment Project

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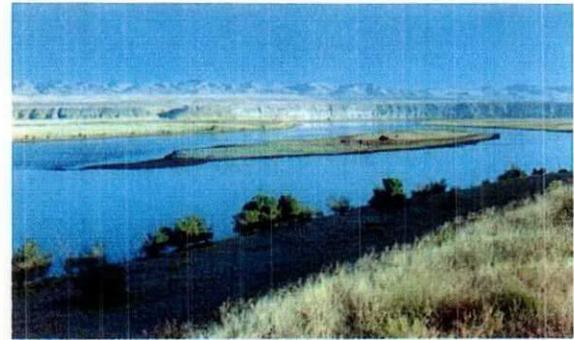
January 2005



United States Department of Energy

P.O. Box 550, Richland, Washington 99352

TRUSTEE COMMUNICATIONS PLAN



FOR THE COLUMBIA RIVER COMPONENT OF THE RIVER CORRIDOR BASELINE RISK ASSESSMENT PROJECT

INTRODUCTION

The Hanford Natural Resource Trustee Council (collectively referred to as the Trustees) includes representatives from Tribal, State, and Federal agencies. As a collaborative working group, the Trustees act on behalf of the public to ensure that remedial actions at the site reflect natural resource values, minimize resource injury, implement sitewide natural resource planning, and encompass good stewardship practices. As interim actions along the Columbia River Corridor come to a close and final actions must be determined, Trustee participation is a necessary and welcome element of the ongoing CERCLA activities to protect and evaluate the Columbia River Corridor.

Those activities include the performance of a baseline risk assessment, which is critical to making decisions regarding final CERCLA remedial actions. A baseline risk assessment, as defined here, evaluates both the current and potential threats to human health and the environment that may be posed by residual contaminants in the environment. In turn, the results of the assessment help frame remedial alternatives that may be required to reduce or eliminate the risks. Within the Columbia River Corridor, DOE-RL has initiated several interrelated risk assessments. Shown in Figure 1, these integrated components—the 100-B/C Pilot Project Risk Assessment, the 100 Area and 300 Area Component of the RCBRA, and the Columbia River Component of the RCBRA—are collectively referred to as the River Corridor Baseline

The Washington State Department of Ecology (Ecology), the U.S. Environmental Protection Agency (EPA), and the U.S. Department of Energy, Richland Operations Office (DOE-RL), known as the Tri-Parties, work together at the Hanford Site to implement cleanup solutions in accordance with the *Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)*. In 1991, the Tri-Parties agreed that, instead of pursuing *final* remedial actions for the Hanford Site, they would pursue *interim* remedial actions, using a “bias for action” approach under CERCLA guidelines. In this approach, CERCLA actions for certain sites are allowed to begin early by relying on streamlined qualitative risk assessments, consistent with EPA guidance, to support actions in lieu of complete baseline risk assessments. The Tri-Parties documented their agreement to perform interim actions under CERCLA in the *Hanford Past-Practice Strategy*, and the use of this strategy expedited the remedial investigation/feasibility study process so remediation could begin in the 100 Area and 300 Area waste sites. An integrated risk assessment, called the River Corridor Baseline Risk Assessment (RCBRA), is now under development to address the hazardous substances released from waste sites along the Columbia River Corridor.

Risk Assessment (RCBRA) Project. Although they are currently being addressed under separate documentation to reflect the unique characteristics of each evaluation, the final report for the Columbia

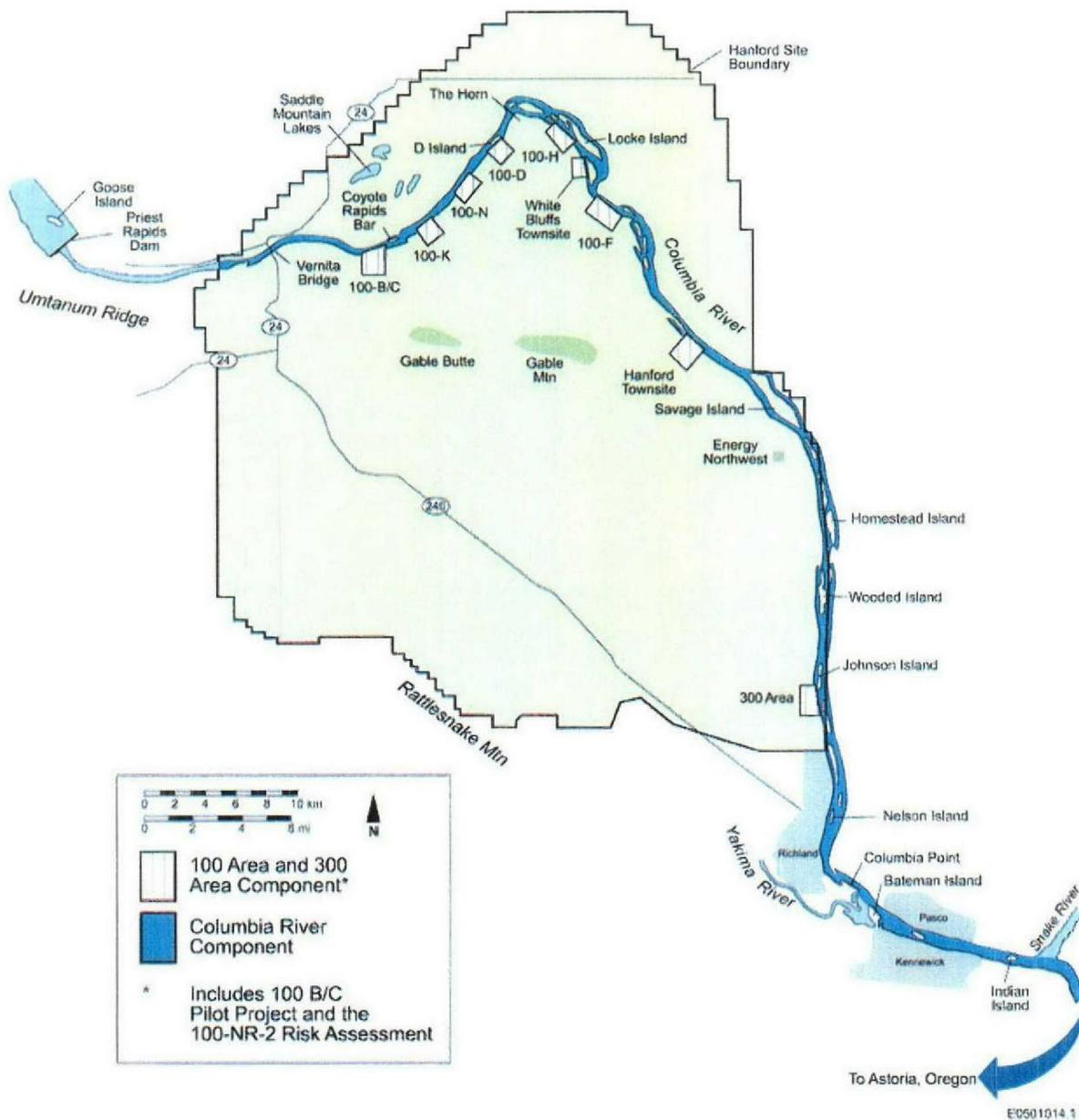


FIGURE 1. COMPONENTS OF THE RCBRA.

River Component of the RCBRA will incorporate the findings of the preceding assessments together with the findings pertaining to the Columbia River. The *Columbia River Component of the River Corridor Baseline Risk Assessment: Basis and Assumptions on Project Scope* (DOE-RL 2004) defines the overall basis, approach, scope, and assumptions that will guide this component of the

RCBRA project through completion. That document, which serves primarily as an agreement between DOE-RL and its contractor to begin the risk assessment process, was provided to the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), the Nez Perce Tribe, the Wanapum, and the Yakama Nation (Tribes), the Natural Resources Trustee Council (Trustees), and

the Hanford Advisory Board during its development to solicit their input and initiate communications. This Communications Plan expands upon that overture by helping to define continuing dialogue between the DOE-RL and all the Trustees.

PROJECT OVERVIEW

The Columbia River Component of the RCBRA will follow the CERCLA risk assessment process to identify Hanford Site contaminants and associated risks within a defined study area along and within the Columbia River. The project will begin by taking a broad view of what constitutes the geographic scope of the river corridor in terms of its length and width, first casting a wide net to capture data, and then allowing those data to determine where the final study boundaries should be drawn.

Initially, existing data from the upstream jurisdictional boundary of the Hanford Site (west of Vernita Bridge) downstream to Astoria, OR, near the mouth of the Columbia River, will be evaluated and summarized. Similarly, the Columbia River Component will involve evaluations of data from reference locations above the Hanford Site boundary (for example, sediments behind the Priest Rapids Dam) as well as other potential sources to the Columbia River (for example, lower portions of the Yakima and Snake Rivers) to determine contributions from non-Hanford Site sources. Subsequently, this existing information will be compiled and analyzed to verify that it is both appropriate and adequate for use in making decisions during the project.

The analysis of the existing data, as well as any supplementary data provided by necessary additional characterization sampling, will then drive the establishment of the geographical boundaries of the study. For example, should data from downstream locations of the area show that concentrations of identified Hanford Site contaminants fall within accepted risk-based standards and/or meet other applicable water and sediment benchmarks, the

downstream boundary of the characterization area will be moved upriver from Astoria. Accordingly, the downstream boundary of the characterization area will be set at the farthest point at which Hanford Site contaminants exceed regulatory standards (for example, ambient water quality criteria) and other benchmarks (for example, sediment screening values). Once the boundaries have been set, the Columbia River Component of the RCBRA will consider multiple human and ecological exposure scenarios, including those developed by the Tribes, and evaluate whether or not risks are excessive without necessarily deciding whether a scenario represents a reasonably anticipated future land use.

PURPOSE

This Trustee Communications Plan serves to extend the process currently directing the 100 Area and 300 Area Component communication and consultation approaches (i.e., DOE/RL-2003-67) to the communication issues of the Columbia River Component. Developed through consultation with the Trustees, this process is proving highly successful for the 100 Area and 300 Area Component, and will ensure appropriate coordination between DOE-RL and the Trustees in the development and performance of the Columbia River Component of the RCBRA Project as well.

PROCESS

Communications will be based on the following precepts:

- ▶ Mutually agreed upon protocols
- ▶ Timely coordination throughout the decision-making process
- ▶ Participation in implementation of selected activities/actions
- ▶ Periodic effectiveness reviews.

The following sections of this Trustee Communications Plan establish the documents to be developed, the schedule under which the project will

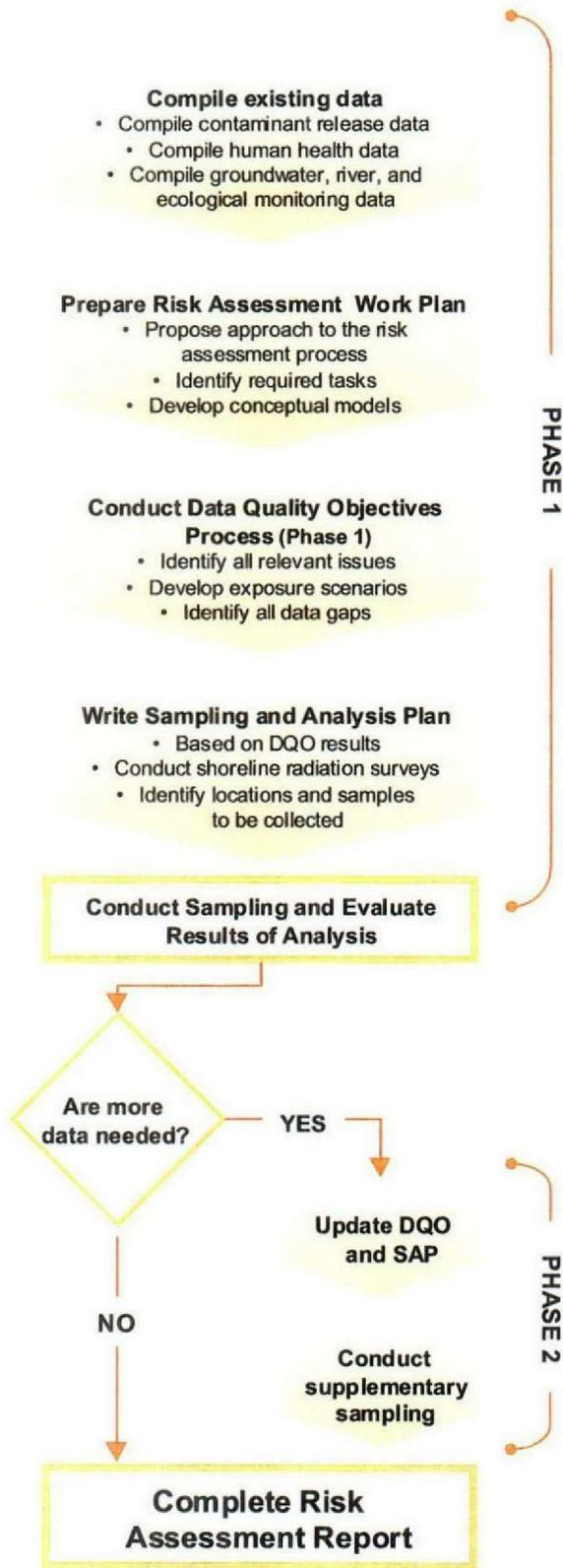


FIGURE 2. SEQUENCE FOR DOCUMENT DEVELOPMENT.

be conducted, the roles of DOE-RL and the Trustees, and communication protocols.

DOCUMENTS TO BE DEVELOPED FOR THE COLUMBIA RIVER COMPONENT OF THE RCBRA

Descriptions of the key documents that will be generated during the performance of the Columbia River Component of the RCBRA are presented below, and Figure 2 illustrates the sequence for their development. Each of these CERCLA documents presents an opportunity for communication, collaboration, and consultation with the Trustees.

Trustee Communications Plan

The Trustee Communications Plan is the overall process that will guide communication and dialogue between DOE-RL and the Trustees throughout the Columbia River Component of the RCBRA Project.

Work Plan

The work plan is the main scoping document for the Columbia River Component of the RCBRA Project. Once existing information (site conditions, contaminants, and potentially exposed ecological and human receptors) has been collected, the Work Plan will propose the preliminary approach to the assessment process. The first step in drafting this document involves creating an “Approach/Annotated Outline” that identifies and briefly describes the information that is anticipated to be presented in the work plan. After this Outline has been presented to the Trustees, reviewers will have the opportunity to suggest changes and indicate which sections they would like to review in early draft stages. When drafts of all the sections are complete, the entire draft Work Plan will be made available for review.

Data Quality Objectives (DQO) Report

The DQO Report identifies the information required to make project decisions; for example, it helps determine what information is necessary to identify

significant risks to potential ecological and human receptors. The DQO process then determines whether existing data offer an adequate basis for making those decisions, and if not, what new data should be collected. Interviews and workshops conducted with Trustee representatives are an integral part of identifying relevant issues, the type of information that is needed to make decisions, and data gaps.

Sampling and Analysis Plan (SAP)

In the event that the DQO Report concludes that more information is needed for project decision-making, then a SAP will be developed to guide the collection of additional data. This plan will specify what additional data are needed, where the data will be collected, and which standards and procedures the data must meet to be considered suitable for use in the decision-making process.

Risk Assessment Report

The Risk Assessment Report uses the data gathered during the implementation of the SAP to assess the risks to humans and the environment based on specific scenarios. The Risk Assessment may stand

alone as an individual report or be incorporated as part of a comprehensive Remedial Investigation Report, which summarizes the site conditions and characterization activities as well as the assessed risks. The Remedial Investigation Report evaluates the identified risks and determines whether they are acceptable.

PROJECT SCHEDULE

A prescribed schedule for the input for, development of, and review of documents and activities associated with the Columbia River Component is fundamental to effective communication between the Trustees and the DOE-RL.

Table 1 presents the schedule as it currently exists. The level of detail included within this schedule is intended to indicate DOE-RL’s general approach for conducting the risk assessment process, and allow the Trustees an early opportunity to plan their participation. Advance notices of meetings and workshops will be sent at least seven days prior to the date on which the meeting or workshop will be held.

TABLE 1. SCHEDULE OF DOCUMENT DEVELOPMENT AND REVIEW.

Document	Activity	Start Date	End Date
RCBRA Columbia River Component Work Plan	Review Annotated Outline	December 6, 2004	December 10, 2004
	Review Drafts of Individual Sections	As available - January 10, 2005	May 6, 2005
	Review Draft A	June 21, 2005	August 26, 2005
	Issue Final (Rev. 0)	September 20, 2005	
RCBRA Compile Existing Data	Workshop on Compilation, Evaluation, and Formatting of Existing Data	December 13, 2004	December 14, 2004
	Monthly Update Meetings (TBD)	January 2005	August 2005
	Workshops to Present Results of Compilation and Evaluation Effort (TBD)	September 12, 2005	September 23, 2005
	Review Draft A Existing Data Report	December 9, 2005	December 22, 2005
	Issue Final (Rev. 0)	January 16, 2006	
RCBRA Columbia River Component DQO	Interviews with Trustee Representatives	January 16, 2006	January 25, 2006
	Compile Scenarios (including Tribal Scenarios)		February 3, 2006 (last date)
	Workshops to Discuss “Issues Matrix”	February 16, 2006	February 24, 2006

TABLE 1. SCHEDULE OF DOCUMENT DEVELOPMENT AND REVIEW.

Document	Activity	Start Date	End Date
	DQO Workshop 1 – Conceptual Model	February 21, 2006	
	DQO Workshop 2 – Working Draft DQO Report	March 6, 2006	
	DQO Workshop 3 – Draft A DQO Report	March 15, 2006	
	Review Draft A DQO	March 15, 2006	March 24, 2006
	Issue Final (Rev. 0)	April 17, 2006	
RCBRA Columbia River Component SAP	Review Draft A SAP	June 23, 2006	August 8, 2006
	Issue Final (Rev. 0)	September 5, 2006	
	Obtain Plant, Animal, Water, Soil Samples - Round 1 (On Site)	TBD 2006	
Update DQO and SAP	Address Data Gaps from Round 1	TBD 2007	
	Obtain Plant, Animal, Water, Soil Samples - Round 2 (Off Site)	TBD 2007	
RCBRA Columbia River Component Risk Assessment/ Remedial Investigation Report		TBD 2009	

COMMUNICATIONS, ROLES, AND EXPECTATIONS

The hallmark of a “good” communication plan is the clarity with which both the objectives of the plan and the roles of the participants are stated. The objectives of the Columbia River Component of the RCBRA are to examine existing data, collect additional data as necessary, and produce a scientifically sound and comprehensive risk assessment that will result in decisions that are protective of human health and the environment. The objective of the Trustee Communication Plan is to establish the protocols under which DOE-RL and the Trustees work together to meet the project objectives.

DOE-RL will take the lead in developing the Work Plan, DQO, and SAP, with Trustee participation invited and encouraged through informal communication (such as e-mails and phone calls), interviews, meetings, or workshops, as appropriate. Both DOE-RL and the Trustees share the expectation that their mutual participation will be timely, constructive, and focused on the project scope and objectives.

The following precepts form the basis for communications between the Trustees and the DOE-RL:

- The performance of the Columbia River Component will be an open process.
- The project will actively consult with the Tribes.
- The project will actively consult with the Natural Resources Trustee Council.
- The project will maintain an open dialogue to provide frequent updates and receive input from interested parties and the Hanford Advisory Board during development of the risk assessment.
- All pertinent unresolved input will be provided to the risk assessment decision-makers (EPA, Ecology, and DOE-RL), who will make the final decisions as to how/whether input is incorporated.
- Responses to input will be communicated back in a timely manner.
- The communication will be as informal as possible to avoid delays or impacts to the

schedule. E-mail is preferred for informal document distribution, comments, and responses.

- Formal communication will be conducted using the *Hanford Federal Facility Agreement and Consent Order* (Ecology et al. 1998) requirements for public involvement on primary documents (for example, per the Tri-Party Agreement, the Risk Assessment Work Plan is a primary document). The requirements for a primary document include mailing a fact sheet to recipients on the Hanford Site mailing list and placing an advertisement announcing the public comment period in the local newspaper. Primary documents will be available at DOE's Public Information Repositories and on the Web site.

Informal Communications

DOE-RL and the Trustees should maintain a continuing dialogue throughout the development and performance of the Columbia River Component. Therefore, regular communication through e-mails and phone calls will serve to keep all parties

ADMINISTRATIVE RECORDS LOCATIONS

EPA

ADS % Environmental Protection Agency
1200 6th Avenue ECL-076
Attn: Jennifer Goki
Seattle, WA 98101
Jennifer: (206) 553-0685

Ecology

Washington State Department of Ecology
Attn: Donna Baldonado
300 Desmond Dr. SE
Lacey, WA 98503
Donna: (360) 407-7105

DOE

Public Access Room
Attn: Debbi Isom
2440 Stevens Center
Room 1101
Richland, WA 99352
Debbi: (509) 376-2530
FAX: (509) 376-4989

informed and engaged. As this informal level of communication will take place primarily between DOE-RL Project Managers, contractors, and Trustee technical-level staff, the Natural Resources Trustee Council will apprise their nonvoting members of project progress and draft document reviews.

INFORMATION REPOSITORIES

Seattle, WA

University of Washington
Suzzallo Library Government Publications
Attn: Eleanor Chase
Box 352900
Seattle, WA 98195-2900
Eleanor: (206) 543-4664
FAX: (206) 685-8049
Email: echase@u.washington.edu

Washington State University – Tri-Cities

U.S. Department of Energy Public Reading Room
Attn: Janice Parthree H2-53
Washington State University
PO Box 999
2770 University Drive
CIC Room 101L
Richland, WA 99352
Janice: (509) 372-7442
FAX: (509) 372-7444
Email: reading_room@pnl.gov

Spokane, WA

Gonzaga University Foley Center
Attn: Connie Scarpelli
East 502 Boone
Spokane, WA 99258-0001
Connie: (509) 323-3839
FAX: (509) 484-5806
Email: carter@its.gonzaga.edu

Portland, OR

Portland State University
Branford Price and Millar Library
Attn: Michael Bowman/Jocelyn Kramer
934 SW Harrison
PO Box 1151
Portland, OR 97207-1151
Michael: (503) 725-3690
Jocelyn: (503) 725-4729
FAX: (503) 725-4524
Email: bowman@lib.pdx.edu

POINT OF CONTACT (POC)

Points of contact (POCs) for the Columbia River Component have been established for each of the following Trustee organizations, as of November 2004:

- CTUIR Stuart Harris
- Nez Perce Dan Landeen
- Yakama Nation.. Wade Riggsbee
- State of Washington
 - Larry Goldstein (Washington Department of Ecology)
 - Lauri Vigue (Washington Department of Fish and Wildlife)
 - Douglas Robison (Washington Department of Fish and Wildlife)
- State of Oregon
 - Susan Coburn Hughs (Oregon Office of Energy)
 - Tom Stoops (Oregon Office of Energy)
- U.S. Department of Interior
 - Don Steffeck (U.S. Fish and Wildlife Service)
 - Jake Jakabosky (Bureau of Land Management)
- U.S. Department of Commerce
 - Mary Baker (National Oceanic and Atmospheric Administration)
- U.S. Department of Energy, Richland Operations Office..... Leif Erickson
 - John Sands
 - Dana Ward
 - Steve Wisness

An extensive collection of background information, as well as copies of final documents produced as part of the project, can be found at public information repositories and administrative records locations.

Access and project information will also be available on the Internet at:

<http://www.bhi-erc.com/projects/risk/risk.htm>.

Reviewers of posted draft documents will be able to provide comments via the web page.

REFERENCES

Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. 9601, et seq.

DOE-RL, 2004, *Columbia River Component of the River Corridor Baseline Risk Assessment: Basis and Assumptions on Project Scope*, DOE/RL-2004-49, Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland, Washington.

DOE-RL, 1991, *Hanford Past-Practice Strategy*, DOE/RL-91-40, Rev 0., U.S. Department of Energy, Richland Operations Office, Richland, Washington.

Ecology, EPA, and DOE, 1998, *Hanford Federal Facility Agreement and Consent Order*, 2 volumes, as amended, Washington State Department of Ecology, U.S. Environmental Protection Agency, and U.S. Department of Energy, Olympia, Washington.