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DATE: August 11, 1994

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FROM: K Leonard

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cc: R G Holt A5-15  
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SUBJECT: ERDF Briefing - July 27, 1995 - Draft Meeting Record

Attached please find the draft meeting record for the above briefing. Please review the meeting record and provide any comments you may have to me by August 19, 1994. I will incorporate your comments and distribute a final version to the Tri-Party points of contact. If I do not receive comments from you by close of business on above date, I will assume you concur. Thanks for your assistance.

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ERDF Briefing  
July 27, 1994  
Federal Building  
Richland, Washington

#### DRAFT MEETING RECORD

Attendees:

Mike Bauer, Yakama Indian Nation  
Charlie Brandt, Pacific Northwest Laboratory  
Chris Burford, Confederated Tribes of the Umatilla Indian Reservation  
Bob Carosino, U.S. Department of Energy, Richland Operations Office  
Allen Childs, Confederated Tribes of the Umatilla Indian Reservation  
Kevin Clarke, U.S. Department of Energy, Richland Operations Office  
Ted Clausing, Washington Department of Fish & Wildlife  
Michael Collins, U.S. Department of Energy, Richland Operations Office  
David Conrad, Nez Perce Tribe  
Jeremy Crow, Nez Perce Tribe  
Allison Crowell, U.S. Department of Energy, Richland Operations Office  
Rico Cruz, Nez Perce Tribe  
Vern Dronen, Bechtel Hanford, Inc.  
Jean Dunkirk, Bechtel Hanford, Inc.  
Dirk Dunning, State of Oregon  
Julie Erickson, U.S. Department of Energy, Richland Operations Office  
Dennis Faulk, U.S. Environmental Protection Agency  
Brian Foley, U.S. Department of Energy, Richland Operations Office  
Jake Jakabosky, U.S. Bureau of Land Management  
Kathy Leonard, Bechtel Hanford, Inc.  
Dave Lundstrom, Washington Department of Ecology  
Armand Minthorn, Confederated Tribes of the Umatilla Indian Reservation  
Donna Powaukee, Nez Perce Tribe  
Greg Rhoades, U.S. Army Corps of Engineers  
Owen Robertson, U.S. Department of Energy, Richland Operations Office  
Fred Roeck, Bechtel Hanford, Inc.  
Jim Stephenson, Washington Department of Fish & Wildlife  
RueAnn Thomas, CH<sub>2</sub>M Hill  
Linda Tunnell, Westinghouse Hanford Company

Brian Foley introduced the Environmental Restoration Disposal Facility Project W-296 (ERDF) Briefing. The purpose of the briefing was to provide an overview of the ERDF site selection process and discuss the recommended preferred location relative to alternatives considered.

Under the original conventional trench configuration, three candidate sites which met the land area requirement were identified: All were located on or partially on the Central Plateau; all fell outside the Waste Management area designated by the Hanford Future Site Uses Working Group.

The siting process used siting criteria requirements from applicable federal and state regulations, U.S. Department of Energy orders and Hanford Future Site Uses Working Group recommendations. The three candidate sites were evaluated in more detail using a two-step review process to select a preferred

site. Step 1: Preliminary screening determined if the sites met WAC-173-303-282 siting criteria. Step 2: The secondary evaluation considered the sites using screening criteria derived from DOE orders, including human health, environmental protection, permitting, construction, and operating factors. Additional regulatory considerations with which the three candidate sites were evaluated were the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) criteria from the National Oil and Hazardous Substances Contingency Plan (NCP), and RCRA criteria for Corrective Action Management Unit (CAMU).

In preliminary screening, Step 1 examined the following under Washington Administrative Code (WAC) 173-303-282: geology, surface water, groundwater, ecology (wet lands, critical habitat, listed or threatened endangered species), meteorology (>100 inches of rain), land use compatibility (parks, farm land, etc.), archeological/historical factors. In preliminary screening, Step 2 examined the following based on DOE Orders 6430.1A, 5820.2A, and 4320.2C, and recommendations from the Hanford Future Site Uses Working Group: human health and environmental criteria (depth to groundwater, topography, off-site protectiveness, and regulatory, construction, and operating criteria (operational factors, permitting requirements, etc.)

Site 3 was chosen as the preferred site because it provided: the greatest protectiveness to human health and the environment from releases, the greatest distance from groundwater, the most topographically suited site, no site infrastructure requiring removal and replacement, the site closest to Hanford Future Site Uses Working Group recommendation, and the lowest cost.

Site 1 was considered less acceptable because it: was less protective, was closer to groundwater, was adjacent to Highway 240/24, was the closest site to the river, had some site infrastructure requiring removal and replacement, and was topographically much less suited.

Site 2 was considered the least acceptable because: it was the least protective due to distance to groundwater, the White Bluff Road bisects the area, it had the highest cost associated with removal and replacement of infrastructure, and the area contamination placed an unacceptable burden on worker health and safety.

A separate, independent evaluation was made of the 200 BC Control Area in response to a public suggestion to locate ERDF there. The 200 BC Control Area was not selected because of: increased cost associated with working in a contaminated area, effects of radiation on health and safety of personnel, additional site characterization requirements, inefficient handling of contaminated soils, and overall impact to schedule.

Because of an enhancement of the preferred site, there was a proposed large scale evolving trench concept. With this evolving trench concept, the trenches would be built on an as-needed basis, thus reducing the land need from 4 square miles to 1.6 miles. According to waste volume estimates, there may be 10 to 30 million cubic yards of waste disposed at ERDF.

In summary of the presentation, Mr. Foley pointed out that Site 3 was recognized by the Tri-Parties as the preferred ERDF site because it fulfills the largest number of siting criteria while maintaining the highest possible level of protectiveness.

Mr. Foley stated that this had been an evolutionary process. He indicated that the Regulatory Package was being prepared for public release for comments, but has been delayed, with a projected release date in mid-September.

CTUIR commended RL for soliciting their concerns in the initial scoping of this project and for taking their concerns into consideration in the screening process.

After the presentation, there were numerous questions and comments from the attendees.

Question: Regarding the trenches: how deep will they be, how will they be containerized, what will they be lined with?

Response: The specifics are spelled out in regulatory package. If ERDF goes forward the project will start with two 500 foot trenches.

Question: Is there a future use indicated for the site in 20-50-100 years?

Response: No, this will be considered a permanent disposal of waste.

Question: Since the site has been so downsized, shouldn't process be revisited?

Response: Since the process is an evolutionary process, it is considered unnecessary to go back and reassess the sites.

Comment: The old 200 Area should be excluded, based on Native American artifacts, undisturbed shrub stepp habitat, candidate plant species and five candidate animal species. Because of these factors, Site 3 shouldn't have even been considered.

Response: Most of the sites are shrub stepp environment, and some candidate species are at all sites.

Comment: It seems that ecological considerations and Native American archeological considerations have been ignored during the siting process.

Response: Only Site 3 was reviewed in depth, the other sites may also have the same issues.

Comment: This site is a consequence of a CERCLA release, damages incurred to natural resources while cleaning up the release will eventually have to be addressed. There was an article in the Oregonian which stated that undisturbed shrub stepp was more valuable than prime old growth; therefore, the economic impacts of placing the trench at Site 3 are potentially very large.

Comment: We were told that this area is so rich in resources that it is essentially unmitigatable. There may not be any alternative resources to replace them with.

Question: Is there going to be any mitigation for cultural resource activity?  
Response: That is unknown. A Biological Resource Plan is being worked on and we need to understand that you have that expectation.

Question: Has there been a cultural resource inventory done on these sites?  
Response: On Site 3.

Question: Have any of the tribes been involved in the inventory?  
Response: I don't believe we had Indian Nation involvement in the inventory.

Comment: The only indication of who did the cultural resource assessment was Golder.

Response: The cultural resource inventory was done by PNL.

Question: What did they do in regard to possible burial grounds?

Response: The inventory was done by walking the site to observe artifacts. The result was that there was nothing on the site of cultural significance. A report is available.

Comment: All tribes are concerned in light of what happened at EMSL.

Comment: The problem is that the tribes weren't involved in the siting process, and that's why the siting assessment should be done again.

Comment: The regulatory package indicates that the driver is to clean up the land in order to release other land for other uses rather than cleaning up a CERCLA release. There are numerous things that point to the fact that the shrub stepp should be protected, and this site is right in the middle of it.

Comment: Gable Mountain is a cultural resource that should be considered. Impacts to Gable Mountain will have an impact to the practice of Native American religion because it is a sacred site.

Question: How much time would it take to do a cultural resource inventory?

Response: A cultural resource inventory would be very appropriate, not only for this site but for the whole Hanford Site. It would involve a lot of oral history; getting the elders to walk the site, identify food, medicine, and historical sites.

Response: Perhaps a two-pronged approach could be taken: Native American elders and religious leaders AND archaeologists could look at various sites. This type of assessment and inventory needs to start now. There are particular concerns about burial grounds.

Response: When the tribes get together and work on a project they can be very efficient. With funding and authorization, they can often do a better job than anyone else.

Question: What precipitated delay in the release of the regulatory package?

Response: There was an internal review and some regulators wanted to look more in depth at the document.

Response: One problem was with the approach of going down a CAMU path. Indications now are that the CAMU path is not a solid path. Now CERCLA may be the driver.

Question: Will there still be an ARAR?

Response: It will essentially be the same, a RCRA permit might be sought. We don't want to delay clean up, and we want to clean up along the river.

Question: Baseline risk assessment indicates a cover will be needed. Shouldn't that be included in part of the evaluation of the site?

Response: The cover alternative is a consideration and will likely be done.

Comment: Since it was not included as part of the evaluation, wouldn't adding covers cause more damage than has been identified because of the necessity of further construction after the initial work is complete?

Comment: Under RCRA, this probably wouldn't pass TCLP Tests for contaminants. If you have to pass the substantive requirements, wouldn't you still have to meet TCLP?

The meeting was adjourned for lunch. The ERDF site tour began at 1:00.