

START

T000113
0037595

Environmental Restoration Disposal Facility
Meeting Minutes
October 12, 1993
EPA, Richland Office

Public Involvement Plan

Lois Thiede, Westinghouse Hanford Company (WHC) Communications presented the revised Environmental Restoration Disposal Facility (ERDF) Public Involvement Plan (PIP) draft. The presentation focussed on the format. The first section covers background and describes the ERDF project, including need for the facility, what it includes, support of Hanford Mission, and the need for public involvement. The next section names the decision makers for ERDF. The final section describes the ERDF decision making process for past and future decisions. This section is subdivided into four parts which outline public involvement objectives and information exchange with the public.

Discussion of the PIP raised a number of questions addressing regulatory issues. Vern Dronen (WHC, Remediated Waste Projects) asked how the PIP addresses the CERCLA ROD regulatory strategy. Jean Dunkirk (WHC, Counsel) asked if the PIP is in addition to RCRA and CERCLA requirements; does it function as an overlay? Dennis Faulk and Pam Innis, EPA representatives, replied that the PIP is above and beyond the CERCLA and RCRA requirements. WHC Counsel indicated that technical documentation for NEPA would need to be attached to the Proposed Plan for the ERDF. Innis stated that NEPA documentation should not be included in the proposed plan for the ERDF. Dunkirk commented that including the plan and NEPA documentation into one document would streamline the review process. It was then suggested that EPA and Ecology consider placing the appendix covering NEPA in the permit application/RI/FS document. Bryan Foley, U.S. Department of Energy, Richland Operations Office (RL), asked how the PIP overlaid with the regulatory plan. Faulk asked if the NEPA requirement for scoping was folded into the PIP. Lois Thiede indicated that step one and portions of step two of the PIP included NEPA scoping; the draft EIS would document alternative solutions and the final EIS would present the preferred solution. Faulk stated that NEPA documentation with no scoping would be open to challenge.

The following information was on the white board in the conference room as a result of the discussion. The list covers additional requirements for documentation.

Additional Documentation

ERDF DOCUMENTATION/DELIVERABLES

- NEPA NOI/Scoping Meeting
- RCRA NOI
- Proposed Plan
- Feasibility Study
- Permit Application
- ROD
- Permit Application

PUBLIC INVOLVEMENT ACTIVITIES

- Scoping w/Public
- Public Review and Comment
- Public Review and Comment

RECEIVED
ERSDF

NOV 02 1993



9413290-2165

9113290-2166

A number of questions were also raised regarding the type and timing of public input. Rich Hibbard, Washington State Department of Ecology, asked if the PIP identified where public involvement is needed to build the ERDF. These areas need to be identified and scheduled, including timing and length of comment periods. Thiede stated that the PIP is a generic plan. Hibbard stated that a schedule is needed to determine the timing of meetings and mail-outs.

The NEPA scoping requirements must be determined; meetings and project definition will affect the schedule. Foley stated that the conceptual design report (CDR) would be an excellent first presentation to the public. Hibbard indicated that presentations should supply proposals for discussion; the CDR appears to make the decision rather than soliciting public input. Innis stated that the CDR does present alternatives. Hibbard replied that the CDR presupposes a landfill. He asked if there should be a meeting to address the feasibility study and alternate solutions. Dunkirk stated that the feasibility study discussed alternate solutions. Innis mentioned vitrification as an alternative; Dunkirk stated the feasibility study summary discussed vitrification. Hibbard reiterated that scoping needs to include the solution selected and alternatives. Faulk indicated that the NEPA requirements must be clarified by DOE. Hibbard noted that public involvement includes educating the public; public understanding of the need for the ERDF will result. Foley stated that the PIP must include NEPA/CERCLA integration. NEPA compliance requirements and difficulties must be described. Scoping could be addressed in two ways: through a public meeting, or through a background information document. Hibbard noted that ERDF is a pilot project establishing NEPA/CERCLA equivalency. Rules must be developed to meet the intent of CERCLA and NEPA regulations. Dronen stated the normal process for public involvement which presents the project, its plan and its drivers. Thiede asked what the plan was, and how public involvement functioned in this. Dronen stated that Thiede, Foley, Dunkirk, and Fred Roeck should meet to discuss proposed public involvement. Thiede agreed that there is a need to lay out schedule and documents required; this would allow proper timing of public involvement events. Faulk noted that DOE guidance on NEPA incorporation is needed. Foley stated that DOE Headquarters (DOE-HQ) indicated that DOE-HQ's Office of Chief Counsel believes that integration of CERCLA and NEPA is the proper course. Documentation must show that NEPA values have been captured by an alternate regulatory approach. Hibbard asked when the final decision on regulatory approach would be made. Foley stated that it would not occur until permitting plan completion. EPA requested that it be noted in the minutes that the regulatory position was that NEPA/CERCLA equivalency were to be demonstrated by this project; DOE's position is that of completing NEPA/CERCLA integration.

Tentative Trench Design Configuration

In response to EPA and Ecology requests for information on trench configuration, Dronen presented a design update. Dronen stated that Golder, subcontractor to the USACE, has proposed a trench design which calls for two rows of adjacent cells, eighteen cells long, with each cell 500 feet square. With the exception of the initial cells, leachate collection points will be on the outside edge of the cell; the collection point for the initial cells will be on the near end. This difference is caused by liner connection on the far end of the cell. Any leachate produced will be collected, analyzed and treated as required before disposal. Vacuum trucks will be provided for use

during leachate events. This leachate will be held for treatment before release.

Dronen provided information regarding material placement configurations. He stated that Golder is currently working on the Trench Operations Sequence Study. The results of this study will recommend how much trench is required to begin operations, and at what rate the trench must evolve. Because the current design calls for a 70-75 foot deep trench with a three-to-one side slopes, the material placement sequence must prevent liner damage or deterioration. The study includes proper fill placement to prevent sloughing and optimum fill sequences for the trench.

Foley stated that WHC is preparing for the thirty percent CDR review. Hibbard asked what type of assistance would be provided for the review. Foley replied that a copy of the USACE Work Plan would be provided. Hibbard asked if this included a preliminary design. Dronen responded that design proceeds from the CDR to definitive design. The CDR sets the cost and schedule; the actual design is selected when analysis is completed. Foley agreed to provide a copy of the USACE Work Plan to Hibbard.

ERDF Agreement Form

Foley presented a draft version of the ERDF Agreement Form. During discussion of the draft, Hibbard asked if a statement regarding commitment to share draft portions of the CDR and regulatory packages with EPA and Ecology would be included. Foley stated that this would be included. Hibbard asked if the signature required is that of the project manager. Innis replied that, due to compliance standards, the project manager's signature is required. Innis commented that the phrase "hydraulic downgrading" under Point of Compliance may need to be deleted. George Evans, Westinghouse Restoration and Remediation, concurred, saying that Point of Compliance should be at the boundary of the unit. Additionally, Innis commented that the Time of Compliance section may need revision. She noted the discrepancy between barrier life of 1000 years, and assessment time of 10,000 years; these numbers should agree. Roeck asked if the risk assessment should be used for Point of Compliance. Dronen stated that by using the risk assessment, a justification for reducing liner requirements could be provided. Regarding regulatory framework, Evans commented that a SEPA checklist could be used; this might be useful in NEPA/CERCLA integration.

Foley committed to revise the agreement form by October 13, 1993.

The next meeting will be held October 26, 1993, from 1:00 p.m. to 3:00 p.m. Agenda items will include discussion of the final Public Involvement Plan draft.

9/13/93 2:167

ACTION ITEMS

1. Action: Finalize the Public Involvement Plan. The meeting to do so will include Fred Roeck, Jean Dunkirk, Vern Dronen, and Bryan Foley.
- Responsibility: Lois Thiede
Due Date: October 26, 1993
2. Action: Prepare a final copy of the Public Involvement Plan to meet the October 31, 1993, milestone.
- Responsibility: Lois Thiede
Due Date: October 31, 1993
3. Action: Provide a copy of the United States Army Corps of Engineers Work Plan to Rich Hibbard of Ecology.
- Responsibility: Bryan Foley
Due Date: October 15, 1993
4. Action: Complete revisions to Agreement Form.
- Responsibility: Bryan Foley
Due Date: October 13, 1993

9172902168

22] From: Deborah A Hopkins at -WHC85 10/25/93 3:57PM (14335 bytes: 6 ln, 1 f
o: Jay M Augustenborg at -DOE15, Michael A (Mike) Casbon, James (Jim) Consort
at -MTC4, Vernon R (Vern) Dronen, Jean H Dunkirk at -WHC52, George C Evans a
-WHC304, Dennis A Faulk at -TPA1, Bryan L Foley at -DOE19,
Danielle E Gilkeson, Pamela S Innis at -TPA1, Frederick V Roeck at -WHC300,
Lois E Thiede at -WHC5, TED WOOLEY FAX# 7363030 at -FAX
subject: ERDF MEETING MINUTES

----- Message Contents -----

Text item 1:

Please see attached WordPerfect 5.1 file.

Thanx,

Deborah for Danielle
376-0277

Project file

RECEIVED

OCT 26 1993

V. R. DRONEN

9413290-2169

Attendees

Name	Company	MSIN	Phone
Augustenborg, Jay	DOE	R3-80	(509) 372-1407
Casbon, Mike	WHC	A5-56	(509) 372-2145
Consort, James	Dames & Moore		
Dronen, Vern	WHC	A5-56	(509) 376-0248
Dunkirk, Jean	WHC	B3-15	(509) 372-2330
Evans, George	WHC	H6-23	(509) 376-8939
Faulk, Dennis	EPA	B5-01	(509) 376-8631
Foley, Bryan	DOE	A5-19	(509) 376-7087
Gilkeson, Danielle	WHC	A5-56	(509) 372-0898
Innis, Pam	EPA	B5-01	(509) 376-4919
Roeck, Fred	WHC	H6-01	(509) 376-8819
Thiede, Lois	WHC	A7-75	(509) 376-7162
Wooley, Ted	Ecology		(509) 736-3012

913200270