



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10 HANFORD PROJECT OFFICE  
712 SWIFT BOULEVARD, SUITE 5  
RICHLAND, WASHINGTON 99352

July 13, 1995

Nancy Werdel  
Operable Unit Manager  
U.S. Department of Energy  
P.O. Box 550, H4-83  
Richland, Washington 99352

Re: 100-BC-1, 100-DR-1, and 100-HR-1 Public Involvement Plan  
Comments

Dear Ms. Werdel:

The attached comments have been developed by the U.S. Environmental Protection Agency (EPA) and the State of Washington Department of Ecology (Ecology) on the draft public involvement plan dated July 11, 1995 for the July 25, 1995 public meeting for 100-BC-1, 100-DR-1 and 100-HR-1 proposed plans.

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38612  
40355

Should you have any question regarding this correspondence or related activities, please contact me at (509) 376-6623, or Phil Staats or Laurie Davies of Ecology at (509) 736-3029 and (360) 407-7113, respectively.

Sincerely,

Kevin J. Oates  
U.S. Environmental Protection  
Agency

Enclosure

cc: Dennis Faulk, USEPA  
Laurie Davies, Ecology  
Phil Staats, Ecology  
Wayne Soper, Ecology  
Keith Holliday, Ecology  
Julie Erickson, DOE  
Mike Thompson, DOE  
Jon Yerxa, DOE  
Rich Holten, DOE  
Steve Logan, ERC  
Greg Eidam, ERC  
Nancy Myers, ERC  
Administrative Record (100-BC-1, 100-DR-1 and 100-HR-1)



EPA & Ecology Comments on the July 11, 1995 Draft Public Involvement Plan developed by DOE for the July 25, 1995 100-BC-1, 100-DR-1 & 100-HR-1 Proposed Plan Public Meeting.

**1. Public Meeting.** We recommend the following format for the public meeting.

- o 6:00 - 6:05 Welcome and Introductions
- o 6:05 - 6:30 Presentation by DOE (or designated alternate) of the main features of the Proposed Plans
- o 6:30 - 7:30 Q & A Session (Includes Formal Comments)
- o 7:30 - 8:30 Poster Session & One on One Discussions

[Note: The room needs to be vacated by 9:00 PM. The time slot from 8:30 - 9:00 could be used to dismantled visual aids and to clean up the room.]

Discussion: The regulatory agencies believe that a representative from DOE should make the presentation of the proposed actions associated with the proposed plans. This will have the effect of communicating ownership as lead agency of cleanup actions for the 100 Area. The regulatory role should be one of assenting support for the these actions and confirmation to the public that the actions are intended to comply with environmental regulations.

Discussion: The presentation and question and answer period should be audiotaped and transcribed for the administrative record. Videotaping of the meeting is likely to intimidate some members of the public, as well as posing technical problems with capturing sound.

Discussion: There is not a need to have a separate Q & A period from formal comments on the record. In the event there are any questions that are not completely responded to at the public meeting, and the question or comment is significant, it will be addressed in the responsiveness summary for the ROD.

Discussion: Facilitation could be handled by the proposed plan presenter. In the event that person is uncomfortable with dual roles, the regulators recommend that Nancy Meyers act as facilitator.

Discussion: TPA panel. We recommend that a unit manager from each of the TPA organizations should staff the panel, since the unit managers are more knowledgeable of the nuts and bolts of activities at the operable units. First recommendation is that the panel should consist of Nancy Werdel from DOE, Phil Staats from Ecology, and Kevin Oates from EPA.

**2. Exhibits.** To date, EPA and Ecology have seen exhibit # 2 , the ERDF model (exhibit # 5), and the videotape for exhibit # 4. Poster boards for exhibits 1, 3, 4, 6, 7, and 8 and the videotape for exhibit # 6 have not been shared with the regulatory agencies. It is not clear how we can reasonably expect to have a meaningful opportunity to provide input to the content of these items, meet production schedules, and participate in dry runs prior to a public meeting that is now less than two weeks away. There may be utility in reconsidering the logistics of developing and finalizing the large number of poster boards in a short period of time. It may be a better use of resources to focus on a small number of high quality visual presentations.

In addition, EPA and Ecology do not support the suggestion to have information related to the HRA-EIS presented at this public meeting. Both agencies have significant concerns regarding that EIS and believe that presentation of information related to that endeavor would only serve to distract discussions from the main focus of the meeting, namely proposed cleanup actions for the three operable units.

**3. Fact Sheets.** Items 1, 2, and 3 need clarification. We assume that these are the same items that were sent out at the beginning of public comment. Please verify this. For item # 4, a fact sheet for the HRA-EIS, as with the exhibits, the regulatory agencies do not support presentation of materials for this activity at the public meeting and recommend that this fact sheet (in preparation) is not finalized and made available at the meeting. The regulatory agencies are not familiar with fact sheets 5, 6, 7, and 8. DOE needs to provide copies to both agencies as soon as possible for review. As with the poster boards, there may be utility in reconsidering the logistics of developing and finalizing the large number of fact sheets in a short period of time. It may be a better use of resources to focus on a small number of high quality presentations.

**4. Media.** Please clarify the status of the first two items; press release and advertisement. Are these the ones that were released at the beginning of public comment or are these some new items? Also, is there any intention to place any radio advertisements

**5. Dry Run.** We recommend that at least two dry runs with regulator participation be scheduled as soon as possible. Preferably both should be held by the end of next week (July 21st) to allow time for refinements prior to the public meeting on the 25th. We will be available to discuss key topics for the presentation.