



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD PROJECT OFFICE
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0038680

November 4, 1993

Bryan Foley
U.S. Department of Energy
P.O. Box 550 MS A5-19
Richland, Washington 99352

Re: EPA Comments on Environmental Restoration Disposal Facility
Public Involvement Plan

Dear Mr. Foley:

The U.S. Environmental Protection Agency has completed our review of the Public Involvement Plan for the Environmental Restoration Disposal Facility.

37597

These comments have been transmitted electronically to you via HLAN. If you have any questions feel free to call me at (509) 376-8631.

Sincerely,

Dennis Faulk
Environmental Scientist

enclosure

cc: Rich Hibbard, Ecology
Ted Wooley, Ecology
Administrative Record (ERDF)



9413294.2706

EPA Comments on Public Involvement Plan for ERDF

General Comment:

The fact that DOE is going to do an EIS on the ERDF permeates the document. The recently completed negotiations has chosen the ERDF for a NEPA/CERCLA pilot project. Why has DOE shied away from this project. At a recent Nuclear Waste Advisory Council Meeting the subject of the pilot project was discussed. The main concern with the approach was that DOE must do all public involvement activities required by NEPA and also must allow for provisions of the judicial review. If these two items are addressed satisfactory this NEPA integration project has a high potential for success. Many area of the document need to be checked in regards to NEPA.

Various locations in the document refer to the new citizen board. The current name is the Hanford Advisory Board.

Comment: paragraph 1, page 1

In the 1st line change under and near to from.

In the middle of paragraph note that little hazardous waste is expected in relation to radioactive and mixed waste.

The last sentence states that there is no effective treatment for these wastes. This is not necessarily true. Vitrification would work well but may be cost prohibitive. Delete the words effectively treat.

Comment: paragraph 2, page 1

This paragraph infers that the Future Site Uses Work Group endorsed the concept of the ERDF. This is not true, what they endorsed was the continued operation of waste management activities and consolidation on the central plateau. This paragraph should be re-written with a bridging statement between the FSUG recommendation and the parties intent to build ERDF.

The sentence pertaining to the ROD is out of context. A new paragraph should be added and should fully explain both the ROD and Permitting process.

Comment: 3rd paragraph, page 1

This paragraph makes reference to milestones. These milestones should be listed or added as an attachment.

Comment: 5th paragraph, page 1

The new Hanford Advisory Board should also be listed in this section.

9473294.2707

Comment: 1st paragraph, page 2

This paragraph is confusing, it should be re-written in the context that many decisions will be required along the way before a final decision is arrived at. Public input will be critical throughout the process.

Comment: paragraph 6, page 2

Define the meaning of RCRA compliment.

Comment: 7th paragraph, page 2

This paragraph discusses siting. EPA believes siting is very far along and should be portrayed as such. The siting was discussed at a public meeting in February, 1993.

Comment: 8th paragraph, page 2

In the last sentence add the word operation after the word construction.

Comment: 2nd paragraph, page 3

Add a sentence saying the ROD will be issued after the RI/FS process. Also add permitting process to discussion.

Comment: paragraph on targeted stakeholders, page 3

This paragraph discusses the 3 agencies as part of the stakeholders. However, later in the document the text appears to indicate stakeholders are the interested public. EPA prefers to delineate between the agencies and interested publics.

Comment: 3rd paragraph, page 4

1993 should be added after all meeting dates.

Comment: 5th paragraph, page 5

The draft permit is sent for comment not the permit application.

Comment: page 6 and 7

On the public involvement activities it makes reference to all values in various places. This language needs to be toned down.

Comment: page 6 and 7

The estimated timeframe for the technical package should be changed to September 1994.

The dates on number 4 should be changed to February and March 1995 time frame.

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