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What do we mean when we say "integration"?
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The term "integration" is used in several ways when discussing Hanford cleanup.

In our discussions about what "integration" means to Oregon, we developed a list of themes and contexts. **We believe that integration must occur within and among all of these.**

We also emphasize that integration is not an end to itself, but is a tool - a way of organizing planning, data collection, and activities to help guide timely and efficient actions and to reach better, less costly decisions.

- 1. **Physical environment** (for example – vadose zone, groundwater, Columbia River, tanks, source units)

Integration of the physical environment means ensuring that cleanup work and the various assessments occurs in a way that considers contaminant movement and impacts in the physical world. This includes following contaminants from their source to their ultimate fate. It also means integrating the overlapping affects of these contaminants. It means recognizing and integrating these impacts on receptors (humans, plants or animals).

Physical integration also includes temporal integration – the integration of activities through time both to recognize inter-related impacts, and to avoid short-sighted actions that may need to be revisited (for example, grouting a tank, only to later need to exhume the whole tank farm to remove leaked waste beneath it).

- 2. **Regulatory frames** (Comprehensive Environmental Response Compensation and Liability Act – CERCLA; National Environmental Policy Act – NEPA; Resource Conservation Recovery Act – RCRA; Model Toxics Control Act – MTCA)

Integration in the regulatory frame means recognizing each of the different regulatory requirements involved and doing the work so that all of the requirements are met simultaneously, instead of potentially re-doing some work by meeting each legal requirement in sequence.

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Within CERCLA, we also encourage that injury assessment be incorporated into the remedial investigation/feasibility study process to insure faster, more efficient cleanup and restoration and to minimize loss of habitat quality and function.

3. **Structural units** (operable units, National Priority List sites)

Structural integration means recognizing that the artificial divisions into operable units and sites ignores the potential impacts that contamination at or from one site may have on another, and that these impacts need to be accounted for. It also means recognizing that actions on neighboring sites may affect one another, or their requirements. For example, capping a site may cause run off into another site.

Integration among structural units is essential to address co-mingling of contaminants from different operating units (for example, releases in the Central Plateau) and from different NPL sites (100 and 200 Area groundwater plumes along the Columbia River)

4. **Management** (DOE offices – Richland, Office of River Protection, Pacific Northwest Science Office; contractors, including Pacific Northwest National Laboratory)

Management integration means recognizing the different organizations that have authority and/or responsibility at various sites and on different issues and coordinating their activities.

5. **Fiscal systems** (separate funds for separate projects that occupy common space and time and for separate contractors; uncertainties in year-to-year funding for long-term projects)

Fiscal integration means recognizing and prioritizing the way work is done so as to ensure the work is performed well and in the time frames it is needed.