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Meeting Minutes Transmittal/Approval  
Hanford Project Managers' Meeting  
Richland, Washington  
December 20, 1994

From/ Appvl.: Steven H. Wisness, RL (A5-19) Date: \_\_\_\_\_  
Hanford Project Manager

Appvl.: *Douglas R. Sherwood* Date: 1/24/95  
Douglas R. Sherwood, EPA (B5-01)  
Hanford Project Manager

Appvl.: *Roger F. Stanley* Date: 1/24/95  
Roger F. Stanley, Ecology  
Director, Tri-Party Agreement Implementation

Prepared by Appvl.: *F. T. Calapristi* Date: 1/26/95  
Frank T. Calapristi  
Westinghouse Hanford Company

DISTRIBUTION

L. D. Arnold	WHC	B2-35	R. D. Morrison	WHC	B2-35
P. Bengtson	WHC	B3-35	D. L. Murphy	DOE	A5-15
F. T. Calapristi	WHC	B2-35	K. Oates	EPA	B5-01
A. S. Carlson	WHC	B3-35	D. R. Sherwood	EPA	B5-01
A. J. Diliberto	WHC	H6-32	R. F. Stanley	Ecology	Olympia
S. D. Godfrey	WHC	B2-35	J. L. Waite	WHC	B2-35
R. S. Hajner	BHI	H4-79	S. H. Wisness	DOE	A5-15
R. Harper	Ecology	Lacey	EPIC	WHC	H6-08
P. S. Kube	DOE	A5-15			



FILENAME--PROJECT20.DEC

## Hanford Project Managers' Meeting

December 20, 1994

Project Managers (PMs): Steve Wisness, Doug Sherwood, Roger Stanley

WHC Tri-Party Agreement: Larry D. Arnold

Recorder: Frank T. Calapristi

## 1. Change Requests (+ R. Morrison, S. Hajner, S. Godfrey)

The Tri-Party Agreement Project Managers reviewed submitted change requests with the following results:

## A. Approved

- M-15-94-05A Treatability Study 100-DR-1 (Attachment 3A)
- M-15-94-07 100-HR-2 Interim Milestones (Attachment 3B)
- M-26-94-01 LERF (Attachment 3C)

## B. Not approved pending further discussion by Unit Managers.

- M-20-94-08 Replace M-20-42 with M-20-42A (Attachment 3D)
- M-20-94-09 Replace M-20-43 with M-20-43A (Attachment 3E)

## C. Submitted for discussion, no action by Project Managers.

- M-16-94-04 Establish 1100 Area Interim Milestones (Attachment 3F)

## 2. Review of Past Action Items (+ F. Calapristi)

The list of past action items were reviewed and updated by the Tri-Party Agreement Project Managers (Attachment 1).

## 3. Public Involvement (+ A. Carlson)

A. Carlson (WHC) distributed the following documents to the Project Managers for general discussion. There were no significant action items or issues identified.

- Response to Comment Document Schedule (Attachment 2A)
- Draft-Public Involvement Strategy (Attachment 2B)
- Public Involvement Calendar/Hanford Happenings (Attachment 2C)

## 4. Closure of "Tri-Party Agreement 5 Year-Review" Requirement/Paragraph 122 (+ R. Morrison)

This topic was discussed under the "Review of Open Action Items". See item #3 of Attachment 1).



5. **Project Managers Agreement on Tri-Party Agreement Appendix F Definition (+ F. Calapristi)**

This topic was discussed under the "Review of Open Action Items".  
See item #1 of Attachment 1.

## AGENDA

## TRI-PARTY AGREEMENT PROJECT MANAGERS MEETING

TUESDAY, DECEMBER 20, 1994

EPA CONFERENCE ROOM  
MEDICAL DENTAL CENTER

- 7:30 am CHANGE REQUESTS  
(S. WISNESS, D.SHERWOOD, R.STANLEY, R.MORRISON)
- o Approval (S. Hajner, J. Waite)
    - o M-15-94-05 Treatability Study 100-DR-1
    - o M-15-94-07 100-HR-2 Interim Milestones
    - o M-20-94-08 Place M-20-42 on Hold
    - o M-20-94-09 Replace M-20-43 with M-20-43A
  - o Discussion (S. Godfrey)
    - o M-26-94-01 LERF

NOTE: THE NOVEMBER AND DECEMBER TPA MILESTONE MEETINGS ARE SCHEDULED  
FROM 8:00 am TO 3:00 pm

- 3:15 pm REVIEW OF PAST ACTION ITEMS-- ATTACHMENT 1 (F. CALAPRISTI)
- 3:30 pm PUBLIC INVOLVEMENT  
(A. CARLSON, L.DAVIES, D.A.FAULK)
- o Facilities Transition Public Involvement Calendar
  - o ER Refocusing Response to Comments
  - o Upcoming Public Comment Period
- 4:00 pm CLOSURE OF "TPA 5 YEAR REVIEW" REQUIREMENT (PARAGRAPH 132)  
(R. STANLEY, D. SHERWOOD, S. WISNESS, R. MORRISON)
- 4:30 pm PROJECT MANAGERS AGREEMENT ON TPA APPENDIX F DEFINITION  
(S. WISNESS, R. STANLEY, D. SHERWOOD, F. CALAPRISTI)
- 5:00 pm ADJOURN

ATTENDEES

## TPA PROJECT MANAGERS MEETING

DECEMBER 20, 1994

EPA CONFERENCE ROOM  
MEDICAL DENTAL CENTER

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>
F.T. CALAPRISTI	WHC/TPAI	B2-35
Roger Stanley	Ecology	
R.D. MERRISON	WHC/TPAI	
Robert Harper	Ecology	Kennewick office
Doug Sherwood	EPA	B5-01
Kevin Oates	EPA	" "
Steve Wilson	DOE	A5-15
Dina Murphy	DOE	A5-15
PAUL Kube	DOE-RC	A5-15
Peter	" "	
Connie Carlson	WHC	B3-35



Change Number <b>M-15-94-05A</b>	<b>Federal Facility Agreement and Consent Order Change Control Form</b> <small>Do not use blue ink. Type or print using black ink.</small>	Date <b>10/24/94</b>
Originator <b>N. A. Werdel</b>		Phone <b>376-5500</b>
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title <b>100-DR-1 Operable Unit Treatability Study Milestone Extension</b>		
Description/Justification of Change  Extend interim milestone M-15-07B completion date from "August 31, 1994" to February 15, 1995". The scope of the milestone remains unchanged, "soil washing pilot scale test activities." The test will be conducted at the 116-D-1 waste site in the 100-DR-1 Operable Unit. The test will evaluate physical separation and attrition scrubbing processes with water only. The milestone will be achieved by the completion of the field testing activities per NPL agreement form #60 (Attachment 1). Testing activities are planned to be conducted during the winter months. Actions will be taken to provide protection against winter weather conditions. However, severe weather conditions could result in a temporary suspension of testing activities and cause a slip in the milestone.		
(Continued on page 2 of 2)		
Impact of Change  This change will delay completion of the current scope of milestone M-15-07B by 6.5 months.		
Affected Documents  100 Area Soil Washing Test Plan (DOE/RL-92-51), and Hanford Federal Facility Agreement and Consent Order Action Plan, Appendix D, Work Schedule.		
Approvals		
<i>Robert B. Holt</i> _____ DOE	<b>11/23/94</b> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
<i>Douglas R. [Signature]</i> _____ EPA	<b>12/20/94</b> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
<i>Roger [Signature]</i> _____ Ecology	<b>12/29/94</b> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved

M-15-94-05A  
Page 2 of 2  
October 24, 1994

Description/Justification of Change (Continued)

Add a new milestone as follows: M-15-07I

Submit 100-DR-1 Pilot Scale Soil Washing Test Report to the regulatory agencies by August 31, 1995. This report will include the following information: results of the pilot scale test and water recycle tests (conducted by PNL in the lab during the fall of FY94); an assessment of the cost benefit and effectiveness of soil washing; and an evaluation of the applicability of pilot scale washing to the bench scale data available from the soils at B/C and F Areas.

Justification for the changes described above is provided in a letter from RL to Ecology dated May 13, 1994 and a letter from EPA and Ecology to RL dated October 20, 1994.

Change Number  M-15-94-07	<b>Federal Facility Agreement and Consent Order Change Control Form</b>  <small>Do not use blue ink. Type or print using black ink.</small>	Date  May 3, 1994
Originator <span style="float: right;">Phone</span>  Eric Goller <span style="float: right;">376-7326</span>		
Class of Change  <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title  100-HR-2 Operable Unit RFI/CMS Interim Milestones		
Description/Justification of Change  Three interim milestones are proposed to ensure that 100-HR-2 Operable Unit Work Plan activities are completed on schedule. They are as follows:  1. (M-15-18A) Submit the 100-HR-2 OU Limited Field Investigation/Qualitative Risk Assessment Report to Ecology and the EPA. Completion date - September 30, 1994.  2. (M-15-18B) Submit the 100-HR-2 OU Focused Feasibility Study Report to Ecology and the EPA. Completion date - January 31, 1994. <i>5 12/20/94</i>  3. (M-15-18C) Submit the 100-HR-2 OU IRM Proposed Plan to Ecology and the EPA. Completion date - January 31, 1994. <i>5 12/20/94</i>		
Impact of Change  This change will not impact the current scope, schedule or investigative costs.		
Affected Documents  Hanford Federal Facility Agreement and Consent Order Action Plan, Appendix D, Work Schedule.  RCRA Facility Investigation / Corrective Measures Study for the 100-HR-2 Operable Unit, Hanford Site, Richland, Washington (DOE/RL 93-20) Draft A.		
Approvals		
<i>[Signature]</i> DOE	<i>8-2-94</i> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
<i>[Signature]</i> EPA	<i>8/2/94</i> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
<i>[Signature]</i> Ecology	<i>8/2/94</i> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved

Change Number <b>M-26-94-01</b>	<b>Federal Facility Agreement and Consent Order Change Control Form</b> <small>Do not use blue ink. Type or print using black ink.</small>	Date <b>12/12/94</b>																																				
Originator <b>S. D. Godfrey</b>		Phone <b>(509) 372-0501</b>																																				
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager																																						
Change title <b>Revise LERF Milestones M-26-03 and M-26-04 Pending Decision Regarding Future Uses of LERF</b>																																						
Description/Justification of Change  <p>This change control form extends the due dates for completion of interim milestones M-26-03 and M-26-04 from 12/31/94 and 6/30/95, respectively to 8/31/95 pending the parties decision regarding the future uses of LERF and to maintain consistency with approved change request M-17-93-07, "Revise due dates for completion of milestones M-17-14 and M-17-29," in which the startup date for the 200 Area Effluent Treatment Facility (ETF) was slipped by 8 months due to the SEPA determination process.</p> <p style="text-align: right;">(Continued on next page)</p>																																						
Impact of Change  <p>This change will allow the continued discharge of the 242-A Evaporator process condensate stream to the LERF units pending the parties decision regarding the future uses of LERF and commensurate with approved change request M-17-93-07. This will allow the 242-A Evaporator to operate, as planned, to complete other Tri-Party Agreement milestones, without being impacted by the delays in startup of the 200 Area ETF (Project C-018H) or the decision regarding the continued use of LERF. Upon determination of the future uses of LERF, a final change to the M-26-03 and M-26-04 milestones will be addressed.</p>																																						
Affected Documents  <p>Hanford Federal Facility Agreement and Consent Order, Forth Ammdement, January, 1994, Appendix D (Table D, page D-56, and Action Plan Work Schedule, page 21 of 40).</p>																																						
Approvals <table style="width:100%; border: none;"> <tr> <td style="width:30%; border-bottom: 1px solid black; vertical-align: bottom;"><i>[Signature]</i></td> <td style="width:20%; border-bottom: 1px solid black; vertical-align: bottom;"><u>12/15/94</u></td> <td style="width:10%; border-bottom: 1px solid black; vertical-align: bottom;"><input checked="" type="checkbox"/></td> <td style="width:10%; border-bottom: 1px solid black; vertical-align: bottom;">Approved</td> <td style="width:10%; border-bottom: 1px solid black; vertical-align: bottom;"><input type="checkbox"/></td> <td style="width:10%; border-bottom: 1px solid black; vertical-align: bottom;">Disapproved</td> </tr> <tr> <td style="font-size: small;">DOE</td> <td style="font-size: small;">Date</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black; vertical-align: bottom;"><i>[Signature]</i></td> <td style="border-bottom: 1px solid black; vertical-align: bottom;"><u>12/20/94</u></td> <td style="border-bottom: 1px solid black; vertical-align: bottom;"><input checked="" type="checkbox"/></td> <td style="border-bottom: 1px solid black; vertical-align: bottom;">Approved</td> <td style="border-bottom: 1px solid black; vertical-align: bottom;"><input type="checkbox"/></td> <td style="border-bottom: 1px solid black; vertical-align: bottom;">Disapproved</td> </tr> <tr> <td style="font-size: small;">EPA</td> <td style="font-size: small;">Date</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black; vertical-align: bottom;"><i>[Signature]</i></td> <td style="border-bottom: 1px solid black; vertical-align: bottom;"><u>12/20/94</u></td> <td style="border-bottom: 1px solid black; vertical-align: bottom;"><input checked="" type="checkbox"/></td> <td style="border-bottom: 1px solid black; vertical-align: bottom;">Approved</td> <td style="border-bottom: 1px solid black; vertical-align: bottom;"><input type="checkbox"/></td> <td style="border-bottom: 1px solid black; vertical-align: bottom;">Disapproved</td> </tr> <tr> <td style="font-size: small;">Ecology</td> <td style="font-size: small;">Date</td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			<i>[Signature]</i>	<u>12/15/94</u>	<input checked="" type="checkbox"/>	Approved	<input type="checkbox"/>	Disapproved	DOE	Date					<i>[Signature]</i>	<u>12/20/94</u>	<input checked="" type="checkbox"/>	Approved	<input type="checkbox"/>	Disapproved	EPA	Date					<i>[Signature]</i>	<u>12/20/94</u>	<input checked="" type="checkbox"/>	Approved	<input type="checkbox"/>	Disapproved	Ecology	Date				
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Ecology	Date																																					

## Description/Justification of Change (continued)

Efforts to bring the ETF on line and to identify additional treatment needs for the Hanford site have recognized the merits of continuing to utilize the LERF either as an interim storage unit or a treatment unit in the ETF treatment system. Significant cost savings and site benefits are possible through the continued use of LERF. As a result, efforts have been directed toward allowing the continued use of LERF and the milestones are changed as shown below to allow these efforts to continue.

The revised milestones are as follows:

M-26-03 Cease Discharge of 242-A Evaporator Process Condensate Effluent to LERF Units.

~~12/31/1994~~  
To Be Decided By  
~~8/31/1995~~

DOE may discharge process condensate effluent from the 242-A Evaporator to Liquid Effluent Retention Facility (LERF) units from December 1990 through ~~December 1994~~ ~~August 1995~~ if (1) the placement of such effluent into LERF is necessary for completion of milestones required by the Agreement; (2) interim status authorization includes these units or a RCRA permit covering these units has been issued; (3) the units satisfy the requirements of 40 CFR Part 264, Subpart K, or 40 CFR Part 265, Subpart K; (4) the units maintain a floating cover which minimizes evaporation; (5) the units comply with all applicable hazardous waste requirements; and (6) prior certification of compliance with 40 CFR 268.4(a)(3) is submitted in accordance with 40 CFR 268.4(a)(4). Discharges of effluent containing hazardous waste subject to the land disposal restrictions other than process condensate from the evaporator to LERF is prohibited.

M-26-04 Remove All Hazardous Waste Residues From the 242-A Evaporator LERF Units.

~~6/30/1995~~  
To Be Decided By  
~~8/31/1995~~

Remove all hazardous waste residues (including any liquid waste) that do not meet LDR treatment standards and applicable prohibition levels imposed by regulation or statute and residues from wastes prohibited from land disposal where no treatment standards have been established and no prohibition levels apply, or which are not delisted pursuant to 40 CFR 260.22 and WAC 173-303-072.

Change Number M-20-94-08	<b>Federal Facility Agreement and Consent Order                  Change Control Form</b> Do not use blue ink. Type or print using black ink.	Date 12/19/94													
Originator H. T. TILDEN <span style="float: right;">Phone 376-0499</span>															
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager															
Change Title DELETE INTERIM MILESTONE M-20-42 AND REPLACE WITH INTERIM MILESTONE M-20-42A.															
Description/Justification of Change  Delete the following Tri-Party Agreement Milestones:  <table style="width:100%; border: none;"> <tr> <td style="width:15%;">M-20-42</td> <td style="width:60%;">Submit Thermal Treatment Part B to Ecology and EPA (T-X-3)</td> <td style="width:25%; text-align: right;">December 1994</td> </tr> </table> Replace interim milestone M-20-42 with the following:  <table style="width:100%; border: none;"> <tr> <td style="width:15%;">M-20-42A</td> <td style="width:60%;">Submit Thermal Treatment Test Facilities Closure Plan to Ecology and EPA (T-X-3)</td> <td style="width:25%; text-align: right;">September 1995</td> </tr> </table> Change the planned action in Appendix B of the Hanford Federal Facility Agreement and Consent Order Action Plan from Treatment Operating Permit to Closure for the Thermal Treatment Test Facilities.  <p style="text-align: center;">Continued on page 2 of 2.</p>			M-20-42	Submit Thermal Treatment Part B to Ecology and EPA (T-X-3)	December 1994	M-20-42A	Submit Thermal Treatment Test Facilities Closure Plan to Ecology and EPA (T-X-3)	September 1995							
M-20-42	Submit Thermal Treatment Part B to Ecology and EPA (T-X-3)	December 1994													
M-20-42A	Submit Thermal Treatment Test Facilities Closure Plan to Ecology and EPA (T-X-3)	September 1995													
Impact of Change  This change will eliminate the submittal of the Part B Permit Application for the unit and requires the submittal of a closure plan for the portion(s) of the facilities which may have managed dangerous waste.															
Affected Documents  Hanford Federal Facility Agreement and Consent Order, Appendix B and D.  Part B Permit Application for the Thermal Treatment Test Facilities.  SEPA Documentation for the Thermal Treatment Test Facilities.  Part A Permit Application, Form 3 for the Thermal Treatment Test Facilities.															
Approvals  <table style="width:100%; border: none;"> <tr> <td style="width:30%; border-bottom: 1px solid black;">DOE</td> <td style="width:10%; text-align: center;">Date</td> <td style="width:10%; text-align: center;">___ Approved</td> <td style="width:10%; text-align: center;">___ Disapproved</td> <td rowspan="3" style="width:30%; vertical-align: middle; text-align: center; padding: 20px;">                             Page 1 of 2                         </td> </tr> <tr> <td style="border-bottom: 1px solid black;">EPA</td> <td style="text-align: center;">Date</td> <td style="text-align: center;">___ Approved</td> <td style="text-align: center;">___ Disapproved</td> </tr> <tr> <td style="border-bottom: 1px solid black;">Ecology</td> <td style="text-align: center;">Date</td> <td style="text-align: center;">___ Approved</td> <td style="text-align: center;">___ Disapproved</td> </tr> </table>		DOE	Date	___ Approved	___ Disapproved	Page 1 of 2	EPA	Date	___ Approved	___ Disapproved	Ecology	Date	___ Approved	___ Disapproved	
DOE	Date	___ Approved	___ Disapproved	Page 1 of 2											
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Ecology	Date	___ Approved	___ Disapproved												

Description/Justification continued.

#### Justification of Change

With the submittal of the Thermal Treatment Test Facilities Part A Permit Application, Form 3 in 1988, thermal treatment activities were projected to occur at the 324 Building Engineering Development Laboratory (EDL), the EDL high bay, the hot-cell complex of the 324 Building, as well as at the 600 Area ISV test site (located just west of the 300 Area) the 116-B-6-1 crib and other selected laboratories in the 324, 325, and 331 buildings. In a RD&D Permitting Strategy Study conducted by RL, PNL, and Westinghouse Hanford Company (WHC), no thermal treatment technologies or activities were identified that need RCRA permitting at this time, and no future need to obtain a "generic" permit for demonstrating these thermal treatment technologies was identified.

Due to the uncertainty of whether thermal treatment test activities conducted at the 600 Area In-Situ Vitrification Test Site, on waste simulants placed in the ground, constituted disposal of a dangerous waste by the material being "treated (but not recycled) before or in lieu of being abandon by being disposed of, burned or incinerated", a closure plan will be prepared for the test site.

Samples undergoing treatability studies are only subject to the requirements of WAC 173-303-050, WAC 173-303-145, and WAC 173-303-960 if the conditions of WAC 173-303-071(s)(i) through (xiii) are complied with. All requirements of those sections were and are being complied with at PNL.

The samples for characterization are not subject to the requirements of WAC 173-303 as long as the conditions of WAC 173-303-071(3)(1)(i) through WAC 173-303-071(3)(1)(iii) are complied with. All requirements of those sections were and are being complied with at PNL.

Other waste management activities in these facilities have consisted mainly of accumulation of hazardous waste in accordance with the generator requirements of WAC 173-303-200. Some treatment and storage activities have inadvertently taken place in the 325 High Level Radiochemistry Facility and 324 hotcell complex portions of the facilities listed in the Part A Permit Application, Form 3 for the Thermal Treatment Test Facilities. However, the treatment activities were not thermal in nature and permitted storage is not an activity listed on the Part A Permit Application, Form 3 for the Thermal Treatment Test Facilities. These activities are not within the scope of the Part A Permit Application, Form 3 for the Thermal Treatment Test Facilities and were never intended to be. The activities of the 324 Radiochemistry Engineering Cell portion of the 324 hotcell complex will be closed under a closure plan submitted in accordance with milestone M-20-43A.

Change Number <b>M-20-94-09</b>	<b>Federal Facility Agreement and Consent Order                  Change Control Form</b> Do not use blue ink. Type or print using black ink.	Date <b>12/19/94</b>													
Originator <b>H. T. TILDEN</b>		Phone <b>376-0499</b>													
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager															
Change Title <b>DELETE INTERIM MILESTONE M-20-43 AND REPLACE WITH INTERIM MILESTONE M-20-43A.</b>															
Description/Justification of Change  Delete the following Tri-Party Agreement Milestone:  <table style="width:100%; border: none;"> <tr> <td style="width:15%;">M-20-43</td> <td style="width:60%;">Submit Physical/Chemical Treatment Part B to Ecology and EPA (T-X-2)</td> <td style="width:25%; text-align: right;">December 1994</td> </tr> </table> <p>Replace interim milestone M-20-43 with the following:</p> <table style="width:100%; border: none;"> <tr> <td style="width:15%;">M-20-43A</td> <td style="width:60%;">Submit Physical/Chemical Treatment Test Facilities Closure Plan to Ecology and EPA (T-X-2)</td> <td style="width:25%; text-align: right;">September 1995</td> </tr> </table> <p style="margin-left: 40px;">This closure plan is for the portion(s) of the Physical/Chemical Treatment Test Facilities that managed dangerous waste within the scope of that unit's Part A Permit Application, Form 3 and that have not been transferred to another Part A Permit Application, Form 3.</p> <p>Change the planned action in Appendix B of the Hanford Federal Facility Agreement and Consent Order Action Plan from Treatment Operating Permit to Closure for the Physical/Chemical Treatment Test Facilities.</p> <p style="text-align: center;">Continued on page 2 of 3.</p>			M-20-43	Submit Physical/Chemical Treatment Part B to Ecology and EPA (T-X-2)	December 1994	M-20-43A	Submit Physical/Chemical Treatment Test Facilities Closure Plan to Ecology and EPA (T-X-2)	September 1995							
M-20-43	Submit Physical/Chemical Treatment Part B to Ecology and EPA (T-X-2)	December 1994													
M-20-43A	Submit Physical/Chemical Treatment Test Facilities Closure Plan to Ecology and EPA (T-X-2)	September 1995													
Impact of Change  This change will eliminate the submittal of the Part B Permit Application for the unit and requires the submittal of a closure plan for the portion(s) of the facilities which have managed dangerous waste.															
Affected Documents  Hanford Federal Facility Agreement and Consent Order, Appendix B and D.  Part B Permit Application for the Physical/Chemical Treatment Test Facilities.  SEPA Documentation for the Physical/Chemical Treatment Test Facilities.  Part A Permit Application, Form 3 for the Physical/Chemical Treatment Test Facilities.															
Approvals  <table style="width:100%; border: none;"> <tr> <td style="width:30%; border-bottom: 1px solid black;">DOE</td> <td style="width:10%; border-bottom: 1px solid black;">Date</td> <td style="width:10%; text-align: center;">___ Approved</td> <td style="width:10%; text-align: center;">___ Disapproved</td> <td rowspan="3" style="width:30%; vertical-align: middle; text-align: center;">Page 1 of 3</td> </tr> <tr> <td style="border-bottom: 1px solid black;">EPA</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="text-align: center;">___ Approved</td> <td style="text-align: center;">___ Disapproved</td> </tr> <tr> <td style="border-bottom: 1px solid black;">Ecology</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="text-align: center;">___ Approved</td> <td style="text-align: center;">___ Disapproved</td> </tr> </table>		DOE	Date	___ Approved	___ Disapproved	Page 1 of 3	EPA	Date	___ Approved	___ Disapproved	Ecology	Date	___ Approved	___ Disapproved	
DOE	Date	___ Approved	___ Disapproved	Page 1 of 3											
EPA	Date	___ Approved	___ Disapproved												
Ecology	Date	___ Approved	___ Disapproved												

Description/Justification continued.

#### Justification of Change

In the original submittal of the Physical/Chemical Treatment Test Facilities Part A Permit Application, Form 3 in 1988, physical and chemical treatment activities were projected to occur at the 324 Building Engineering Development Laboratory (EDL), the EDL high bay, the hot-cell complex of the 324 Building, other selected laboratories in the 324, 325, 327, 329 and 3720 buildings in the 300 Area and lysimeters in the 600 area. In June 1991, a revised Part A Permit Application, Form 3 was submitted which limited the physical and chemical treatment activities to the 324 Building Radiochemistry Hot-Cell Complex, the 324 Building Biological Treatment Test Facilities and added the 325 Shielded Analytical Laboratory (SAL).

Based on a RD&D Permitting Strategy Study conducted by RL, PNL, and Westinghouse Hanford Company (WHC), no other physical or chemical treatment technologies or activities were identified that need RCRA permitting at this time, and no future need to obtain a "generic" permit for demonstrating these treatment technologies was identified.

Under the Physical/Chemical Treatment Test Facilities Part A Permit Application, Form 3, the 325 SAL conducted treatment operations on and stored small quantities of wastes produced during analytical chemistry operations. With approval from Ecology, the 325 SAL facility and activities have been transferred to the 325 Building Hazardous Waste Treatment Units Part A Application, Form 3. This Form 3 was submitted to EPA and Ecology on December 5, 1994.

The primary Physical or Chemical treatment test activities that have been performed at these other facilities were accomplished mainly with simulated wastestreams, on treatability study samples or on samples for characterization. Treatment and storage activities performed with simulated wastestreams are not regulated by WAC 173-303. Residues from the physical or chemical treatment activities on simulated wastestreams were managed in accordance with WAC 173-303 requirements and PNL waste-management practices.

Samples undergoing treatability studies are only subject to the requirements of WAC 173-303-050, WAC 173-303-145, and WAC 173-303-960 if the conditions of WAC 173-303-071(s)(i) through (xiii) are complied with. All requirements of those sections were and are being complied with at PNL.

The samples for characterization are not subject to the requirements of WAC 173-303 as long as the conditions of WAC 173-303-071(3)(1)(i) through WAC 173-303-071(3)(1)(iii) are complied with. All requirements of those sections were and are being complied with at PNL.

Change Request  
M-20-94-09  
December 19, 1994  
Page 3 of 3

Description/Justification continued.

Other waste management activities in the facilities have consisted mainly of accumulation of hazardous waste in accordance with the generator requirements of WAC 173-303-200. Some unpermitted treatment activities have inadvertently taken place in the 325 High Level Radiochemistry Facility portion of the facilities listed in the Physical/Chemical Treatment Test Facilities Part A Permit Application, Form 3. These activities were not intended to be within the scope of the Physical/Chemical Treatment Test Facilities Part A Permit Application, Form 3.

However, some permitted waste management activities may have occurred in the physical/chemical treatment test facilities within the scope of the Physical/Chemical Treatment Test Facilities Part A Permit Application, Form 3. A closure plan will be prepared for these portions of the facilities by September 1995.

9513338.1597

(ATTACHMENT 3F)

<b>Change Number</b> M-16-94-04	<b>Federal Facility Agreement and Consent Order                  Change Control Form</b> Do not use blue ink. Type or print using black ink.	<b>Date</b> 12/5/94
<b>Originator</b> Jane Gardner-Clayson/G. Goldberg		<b>Phone</b> 372-9410
<b>Class of Change</b> <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
<b>Change Title</b> Establish 1100 Area Remedial Action Milestones		
<b>Description/Justification of Change</b> This change package defines three new TPA Interim Milestones to remediate the 1100 Area.  <div style="margin-left: 40px;"> <p><u>M-16-01A</u>                      Submit the Draft Soil Removal Report for the Horn Rapids Landfill to Ecology and EPA.  <span style="float: right;">Due: September 30, 1995</span></p> <p><u>M-16-01B</u>                      Submit the Draft 1100 Area Monitoring Well Installation Report to Ecology and EPA.  <span style="float: right;">Due: September 30, 1995</span></p> <p><u>M-16-01C</u>                      Submit the Draft Close-out Report for the EM-2 and EM-3 Operable Unit to Ecology and EPA.  <span style="float: right;">Due: September 30, 1995</span></p> </div>		
<b>Impact of Change</b> The Action will aid in the remediation of three contaminated sites in the 1100 area.		
<b>Affected Documents</b> Hanford Federal Facility and Consent Order (Tri-Party Agreement) Action Plan, Appendix D, Work Schedule.		
<b>Approvals</b>		
_____ DOE	_____ Date	___ Approved    ___ Disapproved
_____ EPA	_____ Date	___ Approved    ___ Disapproved
_____ Ecology	_____ Date	___ Approved    ___ Disapproved

(ATTACHMENT 1)

**Open Action Items  
Project Managers Meetings**

1. Project Managers are to review proposed TPA Appendix F definition with their respective legal counsel and provide feedback to F. Calapristi (WHC) by the next Project Managers meeting. (April 14, 1994)

Resp: S. Wisness Due: December 22, 1994  
R. Stanley  
D. Sherwood

Status: The Project Managers reviewed the proposed definition of Appendix F and a list of documents for Appendix F in accordance with the proposed definition (Attachment 1A). There was agreement by the project managers on the definition of Appendix F; however, additional information was requested on the process for revising documents. Frank Calapristi took an action to investigate the criteria for revising documents and the process for revising sections contained in the documents.

2. After the Ecology reorganization is communicated to DOE, issue guidance to Hanford management for the distribution of correspondence to Ecology and EPA (February 24, 1994).

Resp: S. Wisness Due: TBD  
R. Stanley  
D. Sherwood

Status: The Ecology organization charts were provided as required by an earlier action item. A separate meeting will be held between DOE-RL, Ecology and EPA to define specific guidance for the delivery of correspondence. This action item is complete.

3. The Five Year Review of the TPA is due and was discussed by the Project Managers. A response is required from the Project Managers to close out this action item. (May 26, 1994)

Resp: S. Wisness Due: December 9, 1994  
R. Stanley  
D. Sherwood

Status: The Project Managers discussed closure of the TPA 5 Year Review requirement (Parf. 117) and concluded with Ecology stating they will propose the establishment of a committee to close out this requirement. Ecology formalized their proposal in a letter to DOE-RL on December 5, 1994 (Attachment 1B). DOE is now reviewing the letter with legal counsel.

4. Review the SMS Program Managers Assessment form and propose a method to document DOE's assessment of the contractor self-assessment (May 26, 1994).

Resp. S. Wisness Due: June 30, 1994

Status: The issue was discussed as a separate item in the August 25 Project Managers meeting. DOE and WHC will issue an internal guidance letter, describing a procedure for the programs to follow when reviewing and signing the SMS Performance Assessment form.

5. Revise TPA Article XL, Paragraph 122 to clarify process and intent of signed and unsigned change requests and the start of the 14 day response period. (November 22, 1994)

Resp. R. Morrison to P. Willison Due: December 9, 1994

Status: Proposed changes to TPA paragraphs 30, 59 and 122 were submitted by DOE to EPA and Ecology (Attachment 1C). The proposed changes are now being reviewed by EPA and Ecology legal counsels.

6. Develop an administrative management plan for integrating the TWRS critical path with the TPA. (November 22, 1994)

Resp. S. Wisness Due: TBD

F. T. Calapristi  
Status date: December 20, 1994

**DRAFT**TPA Appendix F Protocol

Appendix F is a listing of methods and/or processes which shall be maintained separately from the TPA. The documents selected for the Appendix F listing shall meet the following requirements:

- o The three TPA Project Managers must agree with the listed methods and/or processes which are directly supportive of TPA requirements.
- o The documents shall be referenced in the TPA text and are limited to clarifying or expanding agreements which cannot be effectively addressed in the TPA.
- o The listed document shall have a RL designated number and will be issued as a Federal Agency controlled document.

The procedure for adding or deleting documents to the listing shall be in accordance with the TPA change process discussed in Section 12 of the TPA Action Plan and only with concurrence of the three Project Managers.

1/3/94

APENFRI.R1

**Proposed Tri-Party Agreement Appendix F  
(Reference Section 11.6)**

<u>Page</u>	<u>Sect./Parf.</u>	<u>Document</u>	<u>Comments</u>
61	Parf. 105	Proposed Data Quality Strategy for Hanford Site Characterization (WHC-SD-EN-AP-023) January 19, 1991	
6-7	Sect. 6.5		
7-23	Sect. 7.8		
		Hanford Analytical Services Quality Assurance Plan (DOE/RL-94-55)	Replace references in page 6-8, Sect. 6.5 and page 7-23, Section 7.8
9-15	Sect 9.6.2	TPA Databases Access Mechanisms and Procedures (DOE/RL-93-69)	
		Data Validation for RCRA Analysis (WHC-CM-5-3) Section 2	Replace reference in page 9-5, Sect. 9.6.3
		Data Validation for High Level RCRA/CERCLA Radiochemical Analysis (WHC-CM-5-3) Section 2.4	Replace reference in page 9-5 Sect. 9.6.3
		Data Validation Procedures for Chemical Analysis (WHC-SD-EN-SPP-002)	Replace reference in page 9-5 Sect. 9.6.3
		Data Validation Procedures for Radiological Analysis (WHC-SD-EN-SPP-001)	Replace reference in page 9-5 Sect. 9.6.3
		Strategy for Handling and Disposing of Purgewater at the Hanford Site, Washington (WHC-MR-0039) August 21, 1990	Not identified in Tri-Party Agreement, need authorization for Appendix F.
		Environmental Investigation and Site Characterization Manual (CM-7-7)	Not identified in Tri-Party Agreement, need authorization for Appendix F.

951333B.1601

9513338.1602



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-0000



December 5, 1994

Mr. Paul J. Krupin  
Acting Hanford Project Manager  
U.S. Department of Energy  
P.O. Box 550, A5-15  
Richland, WA 99352

Mr. Douglas R. Sherwood  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Blvd., Suite 5  
Richland, WA 99352

Dear Messrs. Krupin and Sherwood:

Re: Tri-Party-Agreement (TPA) Article XLIII, Paragraph 132 (5 Year Review)

This letter follows discussion during the November 1994, Project Managers meeting, at which I described an Ecology proposal addressing commitments under TPA paragraph 132, and committed to forward each of you a subsequent transmittal for approval.

As each of you know, the demands of the TPA negotiations over the last year have been exceptional. As a result, Ecology, the U.S. Environmental Protect Agency (USEPA), and the U.S. Department of Energy (USDOE) have yet to fulfill commitments under TPA paragraph 132 for our (initial) five year review. I believe that we should postpone this review until after negotiation workloads subside. Consequently, I am hereby proposing that:

1. Ecology, USEPA, and USDOE agree to postpone their initial five year review until May 1, 1995;
2. That at that time the three agencies form their review committee (see paragraph 132 language); and
3. That we commit to conclude our review in no more than three months time (by July 31, 1995).

Paul J. Krupin and Douglas R. Sherwood

December 5, 1994

Page 2

If you agree, please acknowledge by way of your signature here, and return a fully signed copy to me.

Sincerely,

Roger Stanley  
Hanford Project Manager  
Nuclear Waste Program

cc: Patrick Willison, USDOE Office of General Counsel  
Larry Arnold, Westinghouse Hanford Company  
Andy Boyd, EPA Office of Regional Counsel  
Tanya Barnett, Office of the WA Attorney General

Concurrence:

\_\_\_\_\_  
Douglas Sherwood                      Date  
Project Manager  
U.S. Environmental Protection Agency

\_\_\_\_\_  
Paul Krupin                                      Date  
Acting Project Manager  
U.S. Department of Energy



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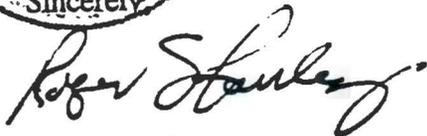
Paul J. Krupin and Douglas R. Sherwood

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Tanya Barnett, Office of the WA Attorney General

Concurrence:

\_\_\_\_\_  
Douglas Sherwood                      Date  
Project Manager  
U.S. Environmental Protection Agency

\_\_\_\_\_  
Paul Krupin                                      Date  
Acting Project Manager  
U.S. Department of Energy

## DRAFT

## Proposed Changes to Tri-Party Agreement Extensions Language

- 1) TPA Paragraph 30 (F), 3rd Line: Change to read:  
"when DOE has delivered a signed change request...."
- 2) TPA Paragraph 59(I), 3rd Line: Change to read:  
"when DOE has delivered a signed change request...."
- 3) TPA Paragraph 122: Delete present language and substitute as follows:

## Old Paragraph 122:

Within fourteen (14) days of receipt of a request for an extension of a timetable and deadline or a schedule, or as otherwise agreed to by the parties in writing, each Party shall advise DOE in writing of its respective position on the request. Any failure of a Party to respond within the fourteen (14) day period (or other period agreed to in writing) shall be deemed to constitute concurrence in the request for extension. If a Party does not concur in the requested extension, it shall include in its statement of nonconcurrence an explanation of the basis for its position.

## New Paragraph 122:

Within 14 days of receipt of a signed change control form requesting an extension of a milestone time table and deadline or other enforceable schedule, each Party shall respond in writing to advise DOE of its respective position on the request. Any failure of a Party to respond within the 14 day period shall be deemed to constitute concurrence in the request for extension. If a Party does not concur in the requested extension, it shall explain the basis of the non-concurrence in the response to the request. The Parties may agree to extend the 14 day period of review. An agreement to extend this period must be reduced to writing and signed by the three Parties. If the Parties agree to extend the period for review and thereafter fail to reach agreement on the request for extension, and if DOE invokes dispute resolution on the denial of the request, the deadlines or schedules at issue shall be extended by the period of time by which the review period exceeds 14 days from the submittal of the signed change control form. An agreement to extend the period for review shall not affect the force and effect of DOE's submittal of a signed change request pursuant to Paragraph 30(F) and Paragraph 59(I). A signed change control form and/or responses may be transmitted by standard mail, electronic facimile, or hand delivery in writing to any Party's normal business location.

**RESPONSE TO COMMENT DOCUMENT  
SCHEDULE**

December 20, 1994

Activity Due Date	Activity	Lead Person or Agency Responsible	Completion Date
10/24	Public comment period begins		
10/27	Contact Editor for assistance in document	POC*	
Ongoing	Start compiling comments	POC	
11/14	Conduct public meeting in Hood River	ALL	
11/15	Conduct public meeting in Seattle	ALL	
11/16	Conduct public meeting in Tri-Cities	ALL	
11/30	Conduct public meeting in Portland	ALL	
12/5	Send tapes to IRM for transcription	DOE/BHI	
12/14	Finalize meeting transcripts and send to POC for incorporation of comments into Response to Comment document	DOE/BHI	
12/16	Point of Contact begins to summarize and compile all the comments into one document	POC	
12/20	Three agencies decide who will respond to each of the comments	ALL	
12/20	Point of Contact provides draft Response to Comment document to three agencies and requests draft responses	POC	
1/9	Draft responses written and sent to Point of Contact		
1/11	Point of Contact incorporates all responses and sends out the draft document for 48-HOUR REVIEW		

1/11-1/13	Three parties review Response to Comment document and finalize responses	ALL	
1/13	All changes due back to the Point of Contact	ALL	
1/14	Point of Contact finalizes document and prepares 100 copies for the Hanford Advisory Board mailing (sent to Board members and alternates only)	POC	
1/15	Point of Contact sends 100 copies to Confluence Northwest for distribution to Hanford Advisory Board members and alternates	POC	
2/2-3	Three parties discuss with Board members and alternates the Response to Comment document	ALL	
2/7	Issues, concerns and comments from the Hanford Advisory Board meeting will be discussed between the three parties and changes indicated in the document	ALL	
2/10	Point of Contact receives all changes to the Response to Comment document	POC	
2/14	Point of Contact makes changes to Response to Comment document and sends it out to three parties for final review	POC	
2/20	Three parties send comments to Point of Contact and document is finalized and prepared for printing and distribution	POC	
2/22	Final change package is reviewed by the agencies' senior staff	Senior staff	
2/23	Draft the cover letter	Ecology	
2/27	Send the cover letter out for review and comments	Ecology	
2/28	All comments sent to Ecology on the cover letter	ALL	

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3/1	Ecology finalizes the cover letter and sends to POC	Ecology	
3/2	Printing and distribution of the final change package	WHC/BHI	
3/6-10	Printing and distribution of the final Response to Comment document	POC	
5/1	Signing of the final Agreement.	AGENCIES	

\*POC = Point of Contact

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## TPA PUBLIC INVOLVEMENT STRATEGY

### I. INTRODUCTION

#### ***A. Background***

In 1989 the US Dept. of Energy (USDOE), the Washington State Dept. of Ecology (Ecology), and the US Environmental Protection Agency (EPA) signed the Hanford Federal Facilities Agreement and Consent Order, commonly known as the Tri-Party Agreement (TPA), that establishes milestones and a schedule for cleanup of the Hanford site. Public involvement in Hanford decision-making is provided for in the Agreement.

#### ***B. Public Involvement Comes to Hanford***

In the years since the signing of the TPA, public involvement has become an increasingly important component of decision-making at Hanford, both for TPA programs and for programs that USDOE-RL (as Hanford is known within the USDOE complex) conducts outside of the TPA. As the mission at Hanford has changed from production of nuclear materials for defense programs to cleanup of the site, the pattern of secrecy and closed-door, in-house decision making has given way, albeit haltingly at times, to increased openness and willingness to bring the public in as active participants in a multitude of decisions, many of daunting complexity. Two recent examples where the State of Washington, Environmental Protection Agency, and U.S. Department of Ecology have joined to sponsor public involvement were the Hanford Future Site Uses Working Group and the Tank Waste Task Force. The TPA agencies recognize that public involvement improves decision-making by assuring that all perspectives are considered before decisions are made. (See Appendix A.) They, as well as Hanford's stakeholders, understand that public involvement can play an important role in building political support essential to maintain funding for Hanford's cleanup.

Increased public involvement in decision making accords with recommendations that grew out of the Federal Facilities Environmental Restoration Dialogue Committee (known as the Keystone Process) to have site-specific advisory boards. At Hanford, these recommendations culminated in 1994 in the institutionalization of public involvement in Hanford decision-making through the creation of the Hanford Advisory Board (HAB). The TPA Agencies have made commitments, individually and collectively, to open, two-way communication with the public and to involve the public in Hanford decision making. (See Appendix B for a description of agency policies, commitments, and programs.)

These trends, together with federal and state regulatory requirements for public involvement (see Appendix C) that have often been interpreted to require meetings on some types of decisions at Hanford, have resulted in a burgeoning number of meetings. In fact, active members of the public and agency staff members are reaching a state of "meeting burnout" as the number of public meetings continues to grow. It is also becoming confusing to have so many outreach efforts happening simultaneously. The agencies and the active members of the public agree that public involvement must be more than a series of meetings that are held regardless of the public's willingness to attend a meeting on the topic at hand. At the same time, the TPA agencies and Hanford's stakeholders, including members of the HAB, have expressed a need and desire to involve the broader public in outreach efforts.

It is readily acknowledged by USDOE-RL, the regulators and the actively involved public that major changes are still needed to make the overall public involvement program more effective and efficient. Both the agencies and those people and organizations that are currently actively involved in Hanford decision-making are seeking a more effective and efficient way to conduct public involvement. They agree that what is needed now is a systematic, coordinated approach to public involvement activities that is agreed to by USDOE and the regulators, as well as by representatives of the public. As a result, in 1994 Ecology, EPA, and USDOE initiated a project to develop a strategy for public involvement. The strategy is being developed in close consultation with Hanford's stakeholders, including members of the Hanford Advisory Board (HAB).

### *C. The role of the HAB in public involvement*

The Hanford Advisory Board was intended by the three parties and HAB members to be a major player in both USDOE-RL and TPA public involvement. The HAB Public Involvement Working Group is currently developing a work plan that will identify the roles and responsibilities it and the full HAB will play in public involvement, and the activities in which the HAB will engage. The discussion centers around three distinct roles:

- advisor to the agencies on public involvement activities
- a link to members' constituencies
- an independent source of public involvement

This strategy paper has been developed in close cooperation with HAB members and the HAB Public Involvement Committee. It does not, however, prescribe or limit the HAB in any way.

### Definitions of Public Involvement

The agencies, the TPA, and the HAB, have slightly different ways of defining public involvement, as exemplified below:

USDOE Secretary Hazel O'Leary defines it as "open, ongoing, two-way communication, both formal and informal, between the USDOE and its stakeholders."<sup>1</sup>

Ecology's Nuclear Waste Program speaks of two focuses for public involvement: "To afford the public the opportunity to be informed and involved with Hanford cleanup; and to provide mechanisms for "highly involved" audiences to participate in cleanup decisions early, continually, and responsively."<sup>2</sup>

EPA describes the purpose of its community relations effort as "two-way communication designed not only to keep citizens informed about site progress, but also to give them opportunity to provide input into site decisions."<sup>3</sup>

The TPA confirms the commitment of the USDOE and its two regulators, EPA and Ecology, actively to seek public involvement in decision-making.<sup>4</sup> In the Community Relations Plan developed by the agencies, they describe as their collective objective in public information and involvement "to assist in establishing two-way communication between the three agencies and the affected and interested public and to provide opportunities for the public to become involved in the decision-making processes for cleanup and compliance of the Hanford site." (June, 1993, p.6.)

The HAB Charter defines its role in public involvement as follows: "The Board is intended to be an integral component for some Hanford tribal and general public involvement activities, but not to be the sole conduit for those activities. The Board should assist the agencies in focusing public involvement and make efficient use of Board member's time and energy. Through its open public meetings, advice on agency public involvement activities, and the responsibilities for Board members to communicate with their constituencies, the Board will assist the broader public in becoming more informed and meaningfully involved in Hanford cleanup decisions."<sup>5</sup>

### D. Definitions of public involvement

Providing access to the decision-making process for the public has been called public involvement, public participation, stakeholder outreach, customer-oriented service, and many other things. For purposes of this document, the term public involvement will be used. It includes providing information and opportunities to influence decision-making to the broadest definable set of publics.

What these agency and HAB policy statements have in common is a recognition that decision-making at Hanford has changed. The public is an integral part in the Hanford decision-making process and has a vitally-important role to play in that process. This far-reaching shift is a result, in part, of federal and state laws that require public involvement in decision-making. It is also due in significant measure to the positive results of several recent public involvement processes at Hanford that have successfully demonstrated the benefits of effective public involvement in resolving difficult policy questions related to Hanford's cleanup.

<sup>1</sup>Guidance on Implementation of the Department's Public Participation Policy, Public Participation Policy Memo, July 29, 1994, p. 1

<sup>2</sup>Nuclear Waste Program Communications Plan for 1995-1997 Biennium, p.5.

<sup>3</sup>citation to be added.xx

<sup>4</sup>See Article XLII, Public Participation, Sections 127-129, pp. 69-70 in the Fourth Amendment to the Agreement, dated Jan. 1994.

<sup>5</sup>Charter and Operating ... , Hanford Advisory Board, May 3, 1994.

## **E. A WORKING DEFINITION: PUBLIC INVOLVEMENT**

Public involvement is a process by which the views and concerns of the public are identified and incorporated into agency decision-making. It includes: identifying public concerns and issues; providing information and opportunities for the public to assist the agencies in identifying issues and problems and in formulating and evaluating decision alternatives; listening to the public; incorporating public concerns and input into decision-making; and providing feedback on how decisions do or do not reflect the input received.

Public information is one part of the public involvement process and includes activities with clear, objective, and timely information to enable the public to effectively participate in Hanford programs. To be useful, information products, such as fact sheets, brochures, newsletters, and exhibits, should identify the means by which the public can comment on and participate in planning, design, and implementation activities should they desire.

## **II. PURPOSE OF THE STRATEGY**

### **A. Purpose**

The purpose of the Hanford Tri Party Agreement (TPA) public involvement strategy is to enhance effectiveness, efficiency and coordination of public involvement in Hanford cleanup decision-making.

Once the strategy is adopted by the Tri-Parties, it is intended to be a living document that is revised and updated through a regular, open review process to reflect changing circumstances or needs. This approach to finalizing and updating the strategy is intended to put into practice what is preached in the strategy, that is, open, flexible, and responsive policy-making.

The strategy identifies the following key policy questions facing the agencies and the Hanford Advisory Board:

- What types of public involvement are necessary and appropriate for what segments of the public; and
- How might public involvement be accomplished in a way that serves all the differing needs for information and involvement?
- What is the distinction between TPA public involvement and public involvement for non-TPA programs; and
- What are the roles and responsibilities of the three agencies with regard to TPA public involvement?

## ***B. Caveats about this strategy***

While this is a TPA public involvement strategy, the relative newness of public involvement to USDOE, both complex-wide and at Hanford, coupled with the increasing demand by USDOE program managers for contact with the public, has resulted in more focus on USDOE in this strategy. It is expected that within the coming year many initiatives to systematize and coordinate public involvement within USDOE-at Hanford will be put in place. It is also expected that the current debates in forums like the HAB over what is public involvement and how it should be conducted will continue as more experience is gained. Therefore, as this strategy evolves in the future, the focus should become more balanced, with less attention devoted to the role USDOE and more to that of the TPA agencies.

This strategy does not address agency interactions with affected Native American Indian Nations, which are conducted on a government-to-government basis unless tribal representatives request otherwise. The State of Washington Centennial Accord establishes the government-to-government relations and the U.S. Dept. of Energy American Indian Policy outlines the government-to-government relationship between the federal government and Federally recognized tribal government.

## **III. PRINCIPLES AND VALUES TO GUIDE PUBLIC INVOLVEMENT AND PUBLIC INFORMATION**

### ***A. Principles and Values***

From agency commitments, policies, and requirements and from the public's demand for involvement in decision-making, the following overarching principles and values for the conduct of public involvement emerge:

- Provide early and frequent opportunities for public involvement in decision making;
- Reinforce the commitment to openness and access to information;
- Strive continuously to increase public awareness of and knowledge about the Hanford clean-up program and activities. Use the values generated by stakeholders as a reference point to establish the context for and commitment to clean-up in each outreach effort ;
- Put information in a context that people can relate to in terms of their life experience. Give people information they desire in a timely fashion, but don't overwhelm people with unwanted information;
- Distinguish between the general public and the interested stakeholders when planning outreach, and tailor information and opportunities to meet needs;

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- Present information in a fashion that leaves room for questioning, testing ideas, and expressing emotions; and
- Let people know that their ideas were considered and how they influenced decision-making.

## **B. Stakeholder Guidelines**

Many of these principles and values are echoed and reinforced in guidelines that were developed at the end of 1993 by the Oregon Hanford Waste Board, Washington Nuclear Waste Advisory Council, and the Affected Tribes (the Nez Perce Tribe, Yakama Indian Nation, and the Confederated Tribes of the Umatilla Indian Reservation). In addition to the federal and state requirements for public involvement, they recommend the following:

- Sufficient advance notice of public involvement activities and adequate coverage to allow people to participate and influence Hanford issues
- Sufficient material provided and readily available to allow public understanding and to facilitate the public's ability to influence issues
- Speakers who are knowledgeable and sensitive to different views and opinions, which will result in a more interactive and productive meeting
- Conveners willing to listen to public comment and apply public input to the decision making process when appropriate
- Use of creative and innovative ways to get information out to the public
- Moderators/facilitators adequately trained to conduct efficient and effective meetings
- Affected parties involved in the design of the public involvement process
- Facility conducive to public participation (convenient location, accessible by public transportation, good sound system and room set up)

## **IV. PROCESS FOR DEVELOPING THE STRATEGY**

In the spring of 1994 the TPA agencies made a joint commitment to develop a public involvement strategy. During the summer a scope of work was negotiated in consultation with the agencies. Key features of the scope were to conduct an extensive set of interviews, hold meetings with agency and stakeholder groups, negotiate roles and responsibilities on public involvement, and provide a framework for ongoing structuring of public involvement. Just under 50 interviews were conducted, either in person or by telephone, with agency staff (including senior management, managers whose programs require public involvement, agency and USDOE-contractor public involvement staff) and with Hanford stakeholders, including members of the HAB. Interview participants were candid in identifying concerns and problems and creative in suggesting different approaches and solutions. In addition, numerous documents were researched to provide an understanding of the range of issues and concerns related to public involvement at

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Hanford and to collect as much current thinking as possible about conducting effective public involvement. All of these sources provided many insights; written documents are cited throughout the strategy.

## V. ISSUES IDENTIFIED IN THE INTERVIEWS

The following list of issues is distilled from interviews and from written sources consulted. Frequently mentioned issues, not in order of importance, were as follows:

- Lack of credibility and trust, especially of USDOE
- Rapid growth of public involvement requirements/activities
  - too heavy reliance on public meetings
  - reactive, not proactive
- Systematic, coordinated approach to public participation needed
  - no jointly agreed upon mission, objectives
  - no clear link between public information and values stated by stakeholders, agencies (USDOE headquarters, USDOE-RL, Ecology, EPA) and contractors (Westinghouse, Bechtel, Dames & Moore/MacTech, PNL) working independently, duplicating efforts
  - methods needed for combining meetings
- Specific tools for managing public involvement needed:
  - list and timeline of major decisions to be made
  - calendar of all (Headquarters, USDOE-RL, TPA, EPA) public involvement activities
  - process and criteria for determining appropriate levels and types of public involvement for various programs
  - clearly defined roles and responsibilities for agencies and HAB, and process for resolving conflicts
  - public involvement budget that reflects all costs of agencies and contractors
- Measures of effectiveness of public involvement efforts needed
  - cost-benefit analysis
  - surveys, interviews
  - not just attendance at meetings
- New approaches to reach a broader public needed
  - innovative ways to inform/engage non-active people advocated

These issues have helped to focus the recommendations in the public involvement strategy.

## VI. STRATEGIC ISSUES AND RECOMMENDATIONS

In the course of preparing this document, a significant number of strategic issues have emerged. These issues fall into roughly three categories:

- Issues that the TPA agencies need to address;
- Issues that relate specifically to USDOE-RL; and
- Issues that must be addressed by the agencies in consultation with the public

For each of these issues, specific approaches are recommended:

### A. Inter-Agency Issues and Recommendations

1. **Issue:** No clear list and timelines for decisions and actions requiring public involvement  
**Recommendation:** Create and regularly update a USDOE-RL list and timeline of major decisions, based on the strategic planning and budget processes, and understandable by the lay public, and use this list to establish the parameters of USDOE-RL and TPA public involvement plans. (*A decisions inventory will be added as an appendix to the strategy.*)  
**Discussion:** At the present time, there does not appear to exist a consolidated calendar of major upcoming decisions that is usable for public involvement planning. Assignment to develop such a list and timeline has been given to the Deputy Manager. Although individual USDOE programs or TPA activities may conduct separate public involvement, site-wide coordinated, proactive, effective and efficient public involvement cannot be done absent this list and timeline.
2. **Issue:** Confusion over requirements  
**Recommendation:** Identify areas of overlap between regulatory or agency requirements for public involvement and agree on practices for streamlining activities.
3. **Issue:** Easy access to information relative to public involvement  
**Recommendation:** Create a central repository at USDOE-RL, Ecology (Lacy and Kennewick), and EPA for public involvement information, including USDOE-RL site-wide plan and program plans, the annual calendar, announcements of meetings, budget information and other items related to public involvement. When a public involvement Desk Reference is complete, keep an updated version at each agency available for public use.

**Recommendation:** Create a Public Involvement Desk Reference, modeled on USDOE-EM Public Participation Desk Reference, published August 15, 1994, with the contents described in Appendix D.

4. **Issue:** Effectiveness, efficiency and coordination of public involvement  
**Recommendation:** The Tri-Parties adopt this public involvement strategy, as revised as a result of public and agency review, and institute a process for evaluating and updating it on an annual basis.

## B. USDOE-RL Issues and Recommendations

1. **Issue:** Communication between site managers and active public  
**Recommendation:** Hold bi-monthly informal meeting between USDOE-RL top management and interested stakeholders (similar to Ecology meetings that are highly praised.)
2. **Issue:** Clear functions and responsibilities of USDOE-RL public involvement staff  
**Recommendation:** Use the newly created USDOE-RL central public involvement staff to improve site-wide public involvement by:
- Coordinating public meetings and outreach activities
  - Leading the monitoring and updating of the RL public involvement strategy
  - Developing RL guidelines for developing program public involvement plans and offering professional advice to program managers and staff about developing public involvement plans and conducting outreach
  - Identifying public involvement training opportunities and needs of USDOE staff, contractors, and regulators.
  - Apprising the three parties of USDOE headquarters policies and guidelines related to public involvement
  - Providing liaison with USDOE headquarters public involvement staff and negotiating with USDOE headquarters over timing and extent of headquarters program public involvement initiatives
  - Coordinating public involvement planning and outreach activities with activities associates with the customer advocacy initiative, so as to eliminate duplication and maximize use of staff and public resources on these two initiatives.
  - Recommending a common approach and easily recognizable format for outreach publicity, including media ads, meeting announcements and mailings, and public involvement policy documents.
  - Compiling the annual public involvement budget for the site, and identifying what resources are being directed to public involvement site-wide
  - Serving as USDOE liaison to the HAB public involvement working group

- Compiling and updating as needed a RL Public Involvement Desk Reference, containing all pertinent laws, regulations, policies, guidelines, plans, programs, budgets, and other documents related to public involvement
  - Serving as the USDOE-RL public involvement liaison staff with headquarters, and with the Tri-Party staff.
3. **Issue:** Coordination of USDOE Headquarters programs and initiatives with USDOE-RL  
**Recommendation:** Include USDOE Headquarters initiatives into the overall planning for and conduct of public involvement at Hanford.

### **C. Issues and Recommendations for TPA Agencies in Consultation with the Public (HAB)**

1. **Issue:** Consensus on TPA agency public involvement missions  
**Recommendations:** Develop USDOE-RL and Tri-Party public involvement mission statements that reflect a consensus of agency and public representatives, including members of the HAB.
2. **Issue:** Lack of process for advance planning on public involvement  
**Recommendation:** Institute a process for compiling a public involvement calendar that includes USDOE Headquarters, USDOE RL, and TPA activities, reviewing planned outreach activities with stakeholders and modifying plans to meet agency and stakeholder needs. Make publication of the TPA "Hanford Happenings" more timely and accurate; revise it so that it provides information needed by the meeting-going public.  
**Recommendation:** Use the USDOE site-wide plan and program plans, along with the Ecology Communications Plan, as a basis for creating a public involvement calendar.  
**Recommendation:** Hold regular quarterly meetings attended by regulators and stakeholders to review public involvement calendar and agree upon needed modifications, and to review overall effectiveness of program and recommend modifications.
3. **Issue:** Public outreach and information materials that are judged to be ineffective  
**Recommendation:** Select, test, and evaluate innovative approaches to improve public involvement activities. Possibilities include the following:
  - Provide a bigger context for decisions so people see why technical decisions are important
  - Consolidate public comment periods and meetings
  - Consider satellite hookups for smaller locations
  - Hold a pre-meeting workshop for the highly interested and well-informed individuals, then a public meeting for those who are interested but not so well informed

- Hold quarterly or bi-annual "Town Hall" type meetings where top managers attend and the focus is general; possibly link to opportunities to comment on specific programs

**Recommendation:** Improve public information materials by selecting, testing and evaluating the following suggested approaches:

- Organize focus groups to test materials and messages
- Piggy back on meetings sponsored by local organizations to explain why cleanup of Hanford is important and describe what is happening
- Aggressively seek opportunities to raise awareness and educate: Rotaries, Kiwanis, etc.

**Recommendation:** Consider focusing outreach activities and information based on the following possible bases:

- Geography at the site, e.g., the 100, 200, 300 areas, etc.
- Strategic core business areas;
- Stakeholder values
- Calendar, with topics that are ready for public review, being listed chronologically

**Recommendation:** Consider alternative approaches to public meetings for receiving public comment, including

- Tabloids with comment sheets attached
- State-owned cable-tv so people don't have to leave home to be informed

4. **Issue:** Defining who the public is

**Recommendation:** Include in the strategy a working definition of the public, including a categorization by levels of interest and by types of public, that becomes the reference point for RL site-wide and program public involvement planning and for TPA public involvement planning. (See Appendix E.)

**Recommendation:** Each agency and each program must identify its most stakeholders and determine their relative levels of interest.

**Recommendation:** USDOE-RL site-wide and program public involvement plans and TPA public involvement plans need to address how they will work with different categories and types of publics.

5. **Issue:** Need a process and criteria for assessing types/levels of public involvement

**Recommendation:** Agree on a process and criteria for assessing appropriate levels of public involvement. (See Appendix F for Suggested Process and Criteria.)

6. **Issue:** Outreach to the broader public

**Recommendation:** Select one or two innovative approaches to public involvement and pilot them for a long enough period to evaluate their effectiveness

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7. **Issue:** Effectiveness of public involvement

**Recommendation:** Annually update and publish as part of the updated strategy a list of staff and stakeholder issues related to public involvement and identifying stakeholder issues related to public involvement compiled based on interviews, surveys, or some other information gathering process.

**Recommendation:** Publish effectiveness measures to be applied to the individual USDOE-RL, Ecology, and EPA programs and to the TPA program.

**Recommendation:** Consider a variety of ways to assess the effectiveness of public involvement efforts beyond attendance at public meetings, such as

- Surveys
- Media coverage
- Cost-benefit

### ***Appendix A - Example public involvement programs that have worked and why***

Agency representatives and representatives from the HAB who were interviewed identified several programs that have mounted effective public involvement efforts, including the Future Site Uses Working Group (1992), the Tank Waste Remediation System (TWRS) Task Force (1993) and the public meetings associated with both, the Plutonium Finishing Plant (PFP) EIS (1994), and the Environmental Restoration Refocusing/Environmental Restoration Disposal Facility public meetings (1994). The programs along with the reasons given for identifying these programs are highlighted below:

- Future Site Uses Working Group - First group that brought together many levels of government (tribal, federal, state, and local) and diverse interests to participate with the agencies in planning Hanford's future, established a process and groundrules for reaching consensus, provided for public involvement prior to developing final recommendations; reached consensus and gave new focus and direction to Hanford's cleanup.
- Tank Waste Remediation System Task Force - Brought together all diverse stakeholders to work simultaneously and in parallel to agency Tri-Party renegotiations on how to address Hanford's tank waste; identified stakeholder values and demonstrated how those values were being used in TPA decision-making; had ample opportunity throughout the process for public involvement by those outside the Task Force; agencies changed major TPA directions, such as the grout program, based on public input.
- Plutonium Finishing Plant EIS - Agreed to do EIS based on public comments; met often with individual stakeholders as thinking about approach progressed - no surprises; (a negative aspect of this program was that USDOE headquarters insisted on a seven-meeting series of public meetings even after being told by the stakeholders that such meetings were unnecessary).
- ER Refocusing and Environmental Restoration Disposal Facility - Worked closely with the HAB to develop public involvement approach; jointly with the HAB, created a Primer for general public education; developed a media strategy in support of the public outreach campaign and conducted a media briefing in conjunction with the HAB meeting in Spokane; changed the size and configuration of the ERDF project based on public comment.

While these four have been given special recognition for their effectiveness, other individual programs led by the three agencies are also doing effective public involvement. What is missing is a coordinated approach that reduces the overall number of meetings and makes most efficient use of agency staff and budget resources and public's willingness to participate in meetings and other public involvement opportunities.

## Appendix B - Agency Policies, Commitments and Programs

### A. Agency Public Involvement Policies and Commitments

#### 1. USDOE

*Headquarters:* Under Secretary Hazel O'Leary, USDOE Headquarters policy and guidelines on public involvement mark "a clear break with past practice by challenging the Department and its contractors to perform to a new standard of openness and service." (O'Leary memo, July 29, 1994) "Public participation must be a fundamental component of the Department's program operations, planning activities, and decision-making. The business of the Department must be open to the full view and input of those whom it serves, consistent with applicable laws, regulations, and contracts."

The Secretary's Guidance (xx or is this the Policy? Check this.) goes on to mandate that "Each site must develop public participation program and plans in consultation with stakeholders, with managers responsible for:

- identifying, planning funding, supporting and implementing the appropriate level and scope of public participation activities in their programs;
- ensuring that public participation principles, values, and processes are fully understood and practiced with their programs and at their sites;
- providing necessary human, information, systems, and financial resources; and
- ensuring that their staff receive basic communication and public participation training, and where appropriate, advanced public participation training." (xx Cite Source here.)

*USDOE RL:* In line with Headquarters directives, USDOE-RL's public involvement policy states that "RL is committed to the process of public involvement and ensuring that the views and concerns of the regulators, tribal nations, stakeholders, and the general public are identified and considered when RL makes decisions." It goes on to note that the decision-making process is to be "fair and open." (Draft dated July 8, 1994).

**2. Ecology:** Ecology's commitment to public participation is based on the Department's premise that public involvement equals better decisions (Washington State Department of Ecology Nuclear Waste Program. Communications Plan for 1995-1997 Biennium, July 1994, p. 4); its goal is to provide for active tribal and public involvement in decision-making by keeping the public informed and involved in Hanford cleanup and compliance (p.3). In addition, it notes that "public involvement is an integral ingredient in cleanup decisions. It is critical to decision-making. Cleanup decisions will reflect public values." (p. 5)

The six goals identified for Ecology's public participation program are to:

1. Provide for active tribal and public involvement in decision-making. Afford the public and the tribes early, continuing, results-oriented public involvement.

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2. Consolidate public comment periods and Hanford cleanup issues to achieve discussions and understanding of big picture cleanup issues.
3. Require accountability in public participation; ensure that Ecology's decisions are responsive to public concerns and values.
4. Increase the level of public credibility in Hanford cleanup through improved public involvement opportunities.
5. Provide effective and diverse ways to communicate with people.
6. Evaluate the effectiveness of Hanford cleanup public information and involvement.

3: *EPA: EPA's Community Relations in Superfund: A Handbook* emphasizes "two-way communication between the public and Superfund staff in planning and implementing community relations programs" (All quotations found on p. xiii of the *Handbook*). The stated objective of Superfund community relations is "to involve the public in activities and decisions related to the cleanup of Superfund sites." The *Handbook* goes on to point out that "An effective community relations program requires the attention and commitment of everyone involved in a Superfund response, regardless of job title. This requires that technical and enforcement staff familiarize themselves with community relations requirements and issues of community concern at a site while community relations staff become aware of the technical and legal issues at a site.

The following overall objectives of Superfund community relations are to:

- "Provide the public the opportunity to express comments on and provide input to technical decisions.
- Inform the public of planned or ongoing actions.
- Identify and resolve conflict."

## B. Public Involvement Programs

USDOE-RL, EPA, and Ecology all have staff members responsible for conducting public involvement, as well as relying on program staff to plan for and conduct public involvement appropriate to their programs. Agency staff members also support the HAB, with additional support from contractors. Because the USDOE is responsible for carrying out the cleanup, it also bears the preponderance of responsibility for conceiving and conducting public involvement; however, on TPA matters, the three agencies coordinate public involvement, and share the lead for its conduct.

Later in this Strategy there are recommendations for developing site-wide and program level public involvement plans. If these recommendations are adopted and met, it will be possible to coordinate non-TPA public involvement with the regulators in a manner that provides them with early notice and an opportunity to influence public involvement planning and conduct, but does not place them in a compromised position of shared responsibility for these activities.

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Each agency also conducts separate public involvement on certain matters. Their respective public involvement programs are described as follows.

### *1. USDOE*

*Headquarters:* USDOE Headquarters conducts public involvement on issues of national significance such as Spent Nuclear Fuel and the DOSE Reconstruction Project. Often these national initiatives are not coordinated with USDOE-RL or TPA public involvement plans and activities, resulting in overlapping and conflicting meetings, and public confusion. USDOE Headquarters is also currently engaged in a public participation planning and coordination effort, including requiring USDOE-wide and headquarters program public involvement plans, and creating a national public involvement network with representatives from each site. This should help establish better coordination; however, USDOE-RL and the Tri-Parties need to insist that their needs and activities are considered as national campaigns are mounted.

At this point, another USDOE Headquarters initiative that is potentially duplicative of the more comprehensive public involvement program recommended in this Strategy should be mentioned, that is, the customer service planning associated with the development of headquarters total quality management (TQM) activities and development of USDOE agency and site strategic plans.

The TQM Implementation Guidelines issued by the USDOE in December 1993, emphasize the importance of identifying and satisfying all the agency's customers, consistent with Executive Order 12862, "Setting Customer Service Standards", signed by President Clinton on September 11, 1993. This Order requires that each federal agency establish and implement customer service standards to carry out the principles of the National Performance Review. Each agency is required to identify its customers and survey them to determine the kind and quality of services they want and their level of satisfaction with existing services; publish service standards and measure results against them; benchmark customer service performance against the best in the business; survey front-line employees on barriers to, and ideas for, matching the best in the business; provide customers with choices in the sources of service and the means of delivery; make information, services, and complaint/plaint systems readily accessible; and provide means to address customer complaints. (TQM Implementation Guidelines, USDOE, September 11, 1993.)

USDOE Offices must develop a Customer Service Plan; likewise each site, and its separate "core business areas" must develop a customer service plan. Based on the Office of Environmental Management Customer Service Plan, published in September, 1994, it is anticipated that the list of "customers" will be very similar to the "publics" listed above. It is very important that the public involvement planning efforts be closely coordinated with the customer service planning efforts.

*USDOE RL:* USDOE-RL management of its overall public involvement program was centralized as recently as September, 1994. Before that time, there was no focus for the burgeoning activities and requirements for outreach. Although responsibility for

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planning and carrying out program-level public involvement still resides with the program staff, there is now a central source to lead strategy development and implementation, and to coordinate outreach agency-wide and with the regulators.

Within the next twelve months, many needed support activities, including development of a public involvement procedures manual, and development and conduct of public involvement training programs, will be instituted by the USDOE-RL central public involvement staff.

2. **Ecology:** Ecology has a public involvement staff for its Nuclear Waste Program, in addition to the agency education and ????? staff, and program staff who plan and conduct public involvement. Public involvement staff is split between Lacey and Kennewick, with Lacey people taking the lead on development of the biennial communications plans and oversight of the overall program and planning for TPA public involvement, and Kennewick people conducting program-level outreach. (???check this for correctness and get examples; talk about public involvement on permitting)

Likewise, Ecology has responsibility for the Model Toxics Control Act and the State Environmental Policy Act (SEPA) implementation and related public involvement, and other programs. In addition, it shares responsibility with the Washington State Department of Health for reviewing and issuing air and water permits at the Hanford site.\*

As indicated in the Communications Plan for the 1995-1997 Biennium, published in July, 1994, Ecology's Nuclear Waste Program also conducts separate media relations activities, exchanges with opinion leaders, congressional briefings, outreach to involved citizens/community activists, Tri-City area community relations, public service announcements, Hanford cleanup displays, information packets and focus sheets, and public participation grants.

3. **EPA:** EPA has a small staff in Richland devoted to public involvement and relies heavily on its program managers for carrying out TPA public involvement activities. EPA participates actively in TPA public involvement activities but rarely initiates separate public involvement on USDOE-RL related programs.

4. **TPA:** In creating the TPA in 1989, the agencies made public involvement an integral feature of the Agreement. Article 42 includes 3 sections. The first indicates that the agencies agree to comply with the public participation requirements of CERCLA, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), and EPA guidance on public participation or the public participation requirements of RCRA. The second describes the agencies' commitment to prepare a *Community Relations Plan*

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\* In addition, Ecology is involved in providing off-site regulatory assistance. The Nuclear Waste Program inspects and permits radioactive mixed-waste facilities off the Hanford Site, including the Puget Sound Naval Shipyard, Washington Public Power Supply System, IT, and Siemens Nuclear.

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(CRP) which "responds to the need for an interactive relationship with all interested community elements, both on and off Hanford, regarding activities and elements of work undertaken by USDOE under this Agreement. The third section indicates that the public participation requirements of the Agreement shall be implemented so as to meet public participation requirements applicable to RCRA. (Hanford Federal Facility Agreement and Consent Order. Fourth Amendment, January 1994, pp. 69-700

The 1993 CRP prepared by the Tri-Party agencies commits to broad-based, frequent and regular public involvement. It states that "the agencies are committed to public involvement, and recognize that people from all over the nation are concerned and affected by the Hanford Site because of the potential threat of this hazardous waste site to human health and the environment. The agencies realize the best long-term solutions come from broad public interest and involvement." (p.1) The CRP goes on to note that the "agencies' objective in public information and involvement is to assist in establishing two-way communication between the three agencies and the affected and interested public and to provide opportunities for the public to become involved in the decision-making processes for cleanup and compliance of the Hanford Site." (p. 6.)

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### Appendix C - Legal Drivers

#### NEPA, SEPA, CERCLA (Superfund), and RCRA

To implement Hanford's TPA cleanup and compliance program, USDOE must obtain approval and permits from either or both regulatory agencies -- EPA and Ecology. Other agencies, including the Washington State Dept. of Health, may be involved to a lesser degree. The authority of these regulatory agencies comes from many laws, but the major laws having the greatest impact on the Hanford Cleanup at the federal level are the National Environmental Policy Act (NEPA), the federal program under the Resource Conservation and Recovery Act (RCRA), the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or "Superfund"). At the State level the most important acts are the State Environmental Policy Act (SEPA) and the State's Hazardous Waste Management Act. Key features of these laws are as follows:

- *NEPA (National Environmental Policy Act)*  
NEPA is the most pervasive of the national environmental laws. It introduces environmental considerations into decision-making by requiring an Environmental Impact Statement (EIS) on all "significant" projects undertaken by the federal government or in an area under federal regulation. NEPA focuses on *process* and the EIS itself is designed to be a tool for decision-making rather than an end in itself. Part of the NEPA process is a requirement that the public be informed and have an opportunity to comment as the environmental review proceeds. Federal agencies, including USDOE, have developed their own regulations for implementing NEPA.
- *SEPA (State Environmental Policy Act)*  
SEPA applies to all state and local levels of government (except the legislative and judicial branches). SEPA is similar to NEPA in that it introduces environmental considerations to the decision-making process and often requires the use of an EIS. Like NEPA, SEPA requires that the public be informed and have an opportunity to comment as the review process proceeds.
- *CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act)*  
CERCLA created a revolving fund ("Superfund") that funds the cleanup of hazardous waste sites that have been listed by EPA on the National Priorities List (NPL). CERCLA addresses hazardous waste practices that occurred before the early 1970's.
- *RCRA (Resource Conservation and Recovery Act)*  
RCRA provides federal regulation of all wastes but especially hazardous wastes. The hallmark of this law was the establishment of a "cradle to grave" system to account for the production, transport, use, and disposal of all hazardous wastes. RCRA regulates present-day activities that in the past led to hazardous waste dumps.

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- Consequently, it is frequently seen as a complement to CERCLA at those sites where hazardous wastes have long been used.

### **Regulatory Oversight at Hanford**

At Hanford, regulatory duties and responsibilities are divided as follows:

- EPA is responsible for regulating what are known as "past practices;" that is, contamination that occurred prior to the early 1970s under Superfund's CERCLA program. EPA is also responsible for implementing provisions of the 1984 Hazardous and Solid Waste Amendments (HSWA) to RCRA.
- EPA has delegated authority to *Ecology* to carry out the base RCRA program in Washington for sites and activities that continue to generate hazardous contaminants. In addition, Ecology implements the provisions of the State's SEPA program.

The lead agency responsible for carrying out these regulations is also the lead agency for public involvement on programs they cover.

At the Hanford site, USDOE funds all investigation and cleanup activities from its own budget. It provides grants to Ecology to fund that agency's oversight functions at Hanford. EPA receives its oversight funding directly from Congress.

RCRA and CERCLA contain requirements for public involvement, including the annual publication of a Community Relations Plan for the TPA, from which this information is adapted.

### **Legal Requirements/Recommendations for Public Involvement**

The following matrix indicates public involvement activities required and/or recommended by regulations and policies.

Public Involvement Requirements/Recommendations

Environmental Impact Statements			RI/FS	
EPA NEPA	USDOE NEPA	SEPA	RCRA/CERCLA	
<b>Public Notice</b>	Notice of Intent (NOI) required in <i>Federal Register</i> ; NOI sent to "interested and affected members of the public"	NOI required in <i>Federal Register</i> ; advanced NOI required in some situations; additional <i>Fed. Reg.</i> notice, news release, or letters to interested parties regarding meeting time and place	Determination of Significance/ scoping notice issued to interested parties; public notice Required (minimum of posting of site and newspaper announcement)	
<b>Public Comment During Scoping</b>	Yes	30 day minimum for public comment	Written comment is bare minimum?	None
<b>Meetings During Scoping?</b>	"A presumption that a scoping meeting will be conducted"	At least one public meeting required no earlier than 15 days after NOI	Not required but can augment written comment period	None
<b>Public Comment Period</b>	At least 45 days	At least 45 days	At least 30 days	"Reasonable opportunity for comment"
<b>Public Hearing?</b>	A public hearing, no earlier than 30 days after release of DEIS	At least one public hearing, announced at least 15 days in advance	Not required?	Public meeting "in the affected area" required
<b>Publicity for Comment Period and Hearing</b>		Use "appropriate means" to focus on those interested and affected	See WAC 197-11-455; minimum is posting of the site and local newspaper announcement	Notice to "potentially affected persons and the public", accompanied by plan summary

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### Appendix D - Public Involvement Desk Reference

1. Purpose
2. Audience - agency staff, including public involvement and program staff, and stakeholders
3. Contents

The strategy, decision inventory and CRP *plus* the following documents:

- a. a three-agency statement of the mission and goals for public involvement related to the TPA;
- b. a statement of values and principles for TPA public involvement
- c. a statement of the HAB mission and goals for Public Involvement mission goals (generated by the HAB);
- d. a description of TPA programs and milestones and a three-year timeline for decision-making that requires public involvement. (Note: this would incorporate Sections 1 & 2 of the CRP and add a description of the programs and milestones with a graphic timeline);
- e. a description of key Hanford activities and decisions outside the TPA. (Note: this would incorporate Appendix A of the CRP and add milestones and a graphic timeline);
- f. an inventory of major TPA milestones that indicates the type of public involvement being conducted at each milestone; Triangle, in consultation with the three agencies and HAB members, will develop a format for the inventory.
- g. a listing of key public involvement activities, including Headquarters initiatives, being conducted outside the TPA;
- h. a listing and highlights of the various agency policies and guidelines related to public involvement, and an appendix containing those documents;\*
- i. a list of key components that should be included in public involvement plans developed for each Tri-Party program;
- j. a brief description of techniques and methods for public involvement, and an Appendix containing more information about those techniques and methods;
- k. a list of criteria and a process for determining the appropriate level and type of public involvement for TPA program activities;
- l. a summary of the public involvement plans for each TPA program, and an appendix containing those plans;
- m. a TPA description of the roles and responsibilities of the three agencies related to public involvement;\*

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\* Triangle Associates will be responsible for drafting this part of the strategy and inventory in consultation with the three agencies and interested members of the HAB. It is our expectation that the remaining components would be prepared by the agencies, and in a few cases, by the HAB.

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- n. a description of the HAB role and responsibilities for TPA public involvement generated by the Board;
- o. a method for updating the strategy and inventory and for resolving issues related to public involvement;\*
- p. a method for evaluating the effectiveness of the public involvement process;\*
- q. the annual TPA Public Involvement Strategy and *CRP*
- r. Appendices
  - 1) Agency Policies and Guidelines related to Public Involvement
  - 2) Public Involvement Techniques, Methods, and Applications
  - 3) TPA program Public Involvement Plans
  - 4) Description of the Hanford Site (Note: incorporate CRP Appendix B)
  - 5) Results of recent public opinion polls related to Hanford Clean-up

### **Appendix E- Definitions and Categories of the Public**

Possible categories of the "public" include:

- *co-decision makers* are those with a role in decision-making, such as the Tri-Parties, who spend considerable time and energy guiding program activities and who influence decision-making through their active involvement;
- *active participants* are those who are highly interested, who will follow certain programs with more interest and involvement than they follow overall activities at the site, and who want to influence those programs;
- *technical reviewers* are those who comment on or evaluate specific technical aspects of the cleanup program;
- *commenters* are those who are moderately interested, who will follow certain programs with more interest and involvement than they follow overall activities at the site, and who expect to influence those programs
- *observers* are those with limited interest who learn about the site through the media or word-of-mouth, but do not desire to participate actively in decision-making unless a program impacts them directly in which case they move to a more active category
- *inactive* citizens are not interested and do not follow site activities but they should be kept informed through the media or other broad-based outreach.. (add something to this)

It is useful to depict these levels as concentric circles, with those who are most interested at the center. This approach can also be used to depict graphically the relative size of the groups.

The public may also be usefully grouped by type of interest represented, such as:

- State and local governments,
- Congress,
- Other federal agencies,
- Review bodies, such as the national Council on Environmental Quality, or the Oregon Hanford Waste Board,
- Community groups,
- Environmental and other interest groups,
- Business,
- Labor,
- Academia,
- Professional and technical organizations,
- Educational organizations,
- USDOE employees and contractors, and
- Members of the general, unaffiliated public.

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**Please note:** Because Native American Indian Nations interact with the agencies through direct government-to-government relations, they are not included in this strategy.

### ***Appendix F - Suggested Process and Criteria***

At the same time that it is essential to develop criteria for screening program activities and determining what type and level of public involvement is appropriate, it is also essential that the results of this screening be open for review by the Tri-Parties and the stakeholders before public involvement plans are finalized. A regular review process that is open to stakeholder representatives, and which focuses on public involvement planning, not on the content of issues under consideration is needed.

A four-step process is recommended for using the attached criteria to assess levels and types of public involvement appropriate for programs which require public involvement in decision-making. The process assumes that there are stakeholders for virtually every decision to be made on site. Managers are strongly advised to go through the first two steps as early in the planning process as possible.

**Step one:** Program managers will review the list of criteria and the values associated with each criterion in the attached matrix and make an initial determination of the impact(s) -- "high," "medium" or "low" -- their program could have on specific values.

**Step two:** Program managers will then consult stakeholders known to be interested in decisions that affect particular values. (A list of possible stakeholders is provided in the matrix.) The purpose of this consultation is to:

- to check the validity of the manager's initial assessment of impacts,
- to inquire if there are other stakeholders/interested parties who should be consulted,
- to discuss how to frame the issue so that its relationship to particular values is apparent, and
- to ask about likely levels of public interest in the decision and its impacts.\*

**Step Three:** The results of this analysis and interaction will be summarized in a brief "assessment report" that describes, in lay terms,

- the "big picture" issue(s) that the specific decision affects, including the criteria and values that are impacted
- stakeholder interest/concerns related to the decision
- estimated public interest in or concern about the issue, which, in turn, will determine appropriate levels and types of public involvement.

**Step Four:** The assessment reports will then be reviewed as part of regularly scheduled meetings attended by agencies and stakeholders, to determine if there has been a change in the expected interest/concern that could impact the proposed level and type of public

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\*This approach assumes that separate consultations will occur with Native American tribes through government-to-government relations.

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involvement. These periodic reviews would ensure that the assessments continue to square with what HAB stakeholders think is appropriate for public involvement.

### Draft Criteria/Values for Assessing Levels of Public Involvement

#### A. Impacts to TPA milestones and activities

- Put wastes in an environmentally safe form, using retrievable waste forms when potential hazards from the waste may require future retrieval and when retrievability does not cause inordinate delays in getting on with the cleanup.
- "Get on with the cleanup" to achieve substantive progress in a timely manner
- Do it expeditiously (schedule progress and assurance)
- Consider the ability to evaluate, expand upon, or change course based on technical and scientific advancement
- Ability to achieve standards with a degree of certainty; now and in the future
- Use the most practicable, timely, available technology, while leaving room for future innovations
- Use a systems design approach that keeps end points in mind as intermediate decisions are made
- Contributions to other missions
- Meet TPA milestones
- Political and institutional support
- Upgrade infrastructure

#### B. Budget

- Establish management practices that ensure accountability, efficiency, and allocation of funds to high priority items
- Reduce long-term waste disposal costs when reductions do not jeopardize safety
- Less costly than other options, while still protective of the environment and public/worker health and safety
- Minimize total life cycle cost
- Minimize discounted costs
- Do the job efficiently (cost effective)
- Economic concerns: budget realities, cost profile
- Political and institutional support

#### C. Regulation of RL activities

- Do not attract other sites' waste for disposal or long-term storage
- Reduce paperwork, analytic, and decision-making redundancy
- Ensure compliance with environmental laws and regulations
- Avoid regulatory uncertainty

#### D. Impacts on the environment

- Protect the environment

- Protect the Columbia River
- Deal realistically and forcefully with groundwater contamination
- Do no harm during cleanup or with new development
- Prevent new harm and risk
- Clean up to the level necessary to enable the future use option to occur
- Address immediate health and environmental risks that need to be addressed
- Minimize risks of the public and environment through stabilization and containment pending final cleanup actions
  
- Address leaking tanks and prevent additional leaks without further compounding future remediation efforts
- Aggressive actions toward tank safety
- Characterization of tank waste
  
- Contribute to environmental remediation and waste containment, stabilization, storage, and disposal in a safe form.
- Put wastes in an environmentally safe form, using retrievable waste forms when potential hazards from the waste may require future retrieval and when retrievability does not cause inordinate delays in getting on with the cleanup.
- Let ultimate best form for the waste drive decisions
- Select a waste form that will ensure safe interim storage of this waste.
- Minimize long-term environmental contamination
- Minimize worker/public radiological exposure
  
- Minimize time duration for resolving environmental concerns
- Minimize transportation of radioactive and hazardous material to and from the site to reduce the risks to the public and the environment
- Less costly than other options, while still protective of the environment and public/worker health and safety
- Ensure removal of largest technically achievable amount of radioactivity from mixed waste before disposal as LLW or incidental waste
- Use Central Plateau wisely for waste management
- Environmental concerns: biota-natural ecosystem impacts, impacts on special species; non-biota - air contamination, groundwater contaminants, surface water contamination (Columbia River), soil contamination

#### **E. Impacts on public/worker health and safety**

- Protect public/worker health and safety
- Do no harm during cleanup or with new development
- Prevent new harm and risk
- Address immediate health and environmental risks that need to be addressed
- Training for everyone who will be on the site is critically important
- Empower safe operations and worker participation in quality implementation
- Minimize time duration for resolving safety issues
- Minimize worker/public radiological exposure

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- Minimize worker industrial hazards
- Protect the Columbia River
- Address leaking tanks and prevent additional leaks without further compounding future remediation efforts
- Let ultimate best form for the waste drive decisions
- Select a waste form that will ensure safe interim storage of this waste.
- Minimize transportation of radioactive and hazardous material to and from the site to reduce the risks to the public and the environment
- Minimize risks of the public and environment through stabilization and containment pending final cleanup actions
- Contribute to environmental remediation and waste containment, stabilization, storage, and disposal in a safe form.
- Less costly than other options, while still protective of the environment and public/worker health and safety
- Characterization of tank waste
- Aggressive actions toward tank safety
- Ensure removal of largest technically achievable amount of radioactivity from mixed waste before disposal as LLW or incidental waste

#### F. Issues of national significance

- Do not attract other sites' waste for disposal or long-term storage

#### G. Regional economy/economic development/future land use

- Clean up areas of high future use value
- Clean up to the level necessary to enable the future use option to occur
- Provide for the greatest range of possible future uses of the Hanford site
- Minimize irrevocable commitments of land and resources
- Maximize unrestricted land availability by minimizing on-site LLW volume
- Minimize off-site waste volume
- 100 years after closure of Hanford - want to be able to use Central Plateau for general use
- Use Central Plateau wisely for waste management
- Capture economic development opportunities locally
- Deal realistically and forcefully with groundwater contamination

#### H. Technological feasibility/desirability

- Less costly than other options, while still protective of the environment and public/worker health and safety
- Consider the ability to evaluate, expand upon, or change course based on technical and scientific advancement
- Maximize flexibility and adaptability for new processes
- Use the most practicable, timely, available technology, while leaving room for future innovations

- Provide maximum flexibility for incorporating improved technology
- Appropriate use of R & D
- Keep technical options open that have realistic, cost-effective chances to significantly improve waste management practices over the life of the cleanup and appropriately implement these options
  
- Utilize simple, reliable processes and systems as much as possible
- Maximize use of mature processes
- Defensibility of technical solutions
- Maximize operability and reliability
- Technology assurance
- Ensure that cleanup actions are achievable and are conducted in a technically sound and expeditious manner
- Use a systems design approach that keeps end points in mind as intermediate decisions are made
  
- Maximize recycle of materials
- Minimize introduction of hazardous chemicals
- Strive to minimize the creation, volume, and toxicity of waste requiring on-site disposal
- Minimize volume of other system generated waste
  
- Characterization of tank waste
- Double-shell tank capacity is important, simpler solutions are preferred
- Ensure adequate double-shell tank space

#### **I. Transportation**

- Transport waste safely and be prepared
- Minimize transportation of radioactive and hazardous material to and from the site to reduce the risks to the public and the environment
- Minimize public transportation hazards

#### **J. Storage/disposal**

- Use Central Plateau wisely for waste management
- 100 years after closure of Hanford - want to be able to use Central Plateau for general use
- Do not attract other sites' waste for disposal or long-term storage
  
- Put wastes in an environmentally safe form, using retrievable waste forms when potential hazards from the waste may require future retrieval and when retrievability does not cause inordinate delays in getting on with the cleanup.
- Select a waste form that will ensure safe interim storage of this waste.
- Maximize early immobilization for disposal progress
- Maximize waste conversion to releasable forms
- Strive to minimize the creation, volume, and toxicity of waste requiring on-site disposal

- Minimize off-site waste volume

**K. Pace of cleanup**

- "Get on with the cleanup" to achieve substantive progress in a timely manner
- Let ultimate best form for the waste drive decisions
- Demonstrate on the ground progress as quickly as possible
- Show substantial near-term cleanup progress
- Do it expeditiously (schedule progress and assurance)
- Move all major facets of cleanup forward and in proper sequence
- Minimize time duration for resolving environmental concerns
- Minimize campaign duration
- Minimize time duration for resolving safety issues
- Ability to achieve standards with a degree of certainty; now and in the future
- Avoid focus on short-term problems
- Keep focus on long-term needs and goals

**L. Management issues**

- Reduce paperwork, analytic, and decision-making redundancy
- Empower safe operations and worker participation in quality implementation
- Move all major facets of cleanup forward and in proper sequence
- Consider the ability to evaluate, expand upon, or change course based on technical and scientific advancement
- Establish management practices that ensure accountability, efficiency, and allocation of funds to high priority items
- Minimize time for institutional control (sic)
- Quality management
- Avoid focus on short-term problems
- Keep focus on long-term needs and goals

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**Criterion: Impacts to TPA Milestones and Activities  
"Values"**

- Put wastes in an environmentally safe form, using retrievable waste forms when potential hazards from the waste may require future retrieval and when retrievability does not cause inordinate delays in getting on with the cleanup.
- "Get on with the cleanup" to achieve substantive progress in a timely manner
- Do it expeditiously (schedule progress and assurance)
- Consider the ability to evaluate, expand upon, or change course based on technical and scientific advancement
- Ability to achieve standards with a degree of certainty; now and in the future
- Use the most practicable, timely, available technology, while leaving room for future innovations
- Use a systems design approach that keeps end points in mind as intermediate decisions are made
- Contributions to other missions
- Meet TPA milestones
- Political and institutional support
- Upgrade infrastructure

Potential Stakeholders	Potential Impact		
	High	Medium	Low
State of Washington Oregon Dept. of Energy Oregon Hanford Waste Board Local governments Hanford Watch HEAL Columbia River United Heart of America NW Environmental Advocates USDOE employees and contractors			

**Criterion: Budget**

**"Values"**

- Establish management practices that ensure accountability, efficiency, and allocation of funds to high priority items
- Reduce long-term waste disposal costs when reductions do not jeopardize safety
- Less costly than other options, while still protective of the environment and public/worker health and safety
- Minimize total life cycle cost
- Minimize discounted costs
- Do the job efficiently (cost effective)
- Economic concerns: budget realities, cost profile
- Political and institutional support

Potential Stakeholders	Potential Impact		
	High	Medium	Low
State of Washington State of Oregon Oregon Hanford Waste Board Hanford Watch HEAL Heart of America Local government			

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### Criterion: Regulation of RL Activities

#### "Values

- Do not attract other sites' waste for disposal or long-term storage
- Reduce paperwork, analytic, and decision-making redundancy
- Ensure compliance with environmental laws and regulations
- Avoid regulatory uncertainty

Potential Stakeholders	Potential Impact		
	High	Medium	Low
State of Washington Local governments State of Oregon Oregon Hanford Waste Board Hanford Watch HEAL Heart of America			

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**Criterion: Impacts on the Environment**

**"Values"**

- Protect the environment
- Protect the Columbia River
- Deal realistically and forcefully with groundwater contamination
- Do no harm during cleanup or with new development
- Prevent new harm and risk
- Clean up to the level necessary to enable the future use option to occur
- Address immediate health and environmental risks that need to be addressed
- Minimize risks of the public and environment through stabilization and containment pending final cleanup actions
  
- Address leaking tanks and prevent additional leaks without further compounding future remediation efforts
- Aggressive actions toward tank safety
- Characterization of tank waste
  
- Contribute to environmental remediation and waste containment, stabilization, storage, and disposal in a safe form.
- Put wastes in an environmentally safe form, using retrievable waste forms when potential hazards from the waste may require future retrieval and when retrievability does not cause inordinate delays in getting on with the cleanup.
- Let ultimate best form for the waste drive decisions
- Select a waste form that will ensure safe interim storage of this waste.
- Minimize long-term environmental contamination
- Minimize worker/public radiological exposure

Potential Stakeholders	Potential Impact		
	High	Medium	Low
State of Washington State of Oregon Local governments Oregon Hanford Waste Board Lower Columbia Basin Audubon Society Washington Environmental Council Community groups Hanford Watch HEAL Heart of America Physicians for Social Responsibility Columbia River United NW Environmental Advocates Members of the general, unaffiliated public			

**Criterion: Impacts on the Environment (continued)**

**"Values"**

- Minimize time duration for resolving environmental concerns
- Minimize transportation of radioactive and hazardous material to and from the site to reduce the risks to the public and the environment
- Less costly than other options, while still protective of the environment and public/worker health and safety
- Ensure removal of largest technically achievable amount of radioactivity from mixed waste before disposal as LLW or incidental waste
- Use Central Plateau wisely for waste management
- Environmental concerns: biota-natural ecosystem impacts, impacts on special species; non-biota - air contamination, groundwater contaminates, surface water contamination (Columbia River), soil contamination

**Potential Stakeholders**

**Potential Impact**

**High**

**Medium**

**Low**

951333B-1445 (ATTACHMENT 2C)

# Hanford Happenings

December 1994

Cleanup is underway at Hanford, and the pace of work is picking up. The number of actions requiring public participation continues to grow. The three parties, U.S. Department of Energy, Washington State Department of Ecology and U.S. Environmental Protection Agency, offer this monthly flier to help you keep track of scheduled meetings, comment periods and events, and the inevitable changes in schedules.

## Public Meetings:

DATE	PROGRAM	CONTACT
<b>JANUARY</b>		
January 5	Hanford Advisory Board meeting. Kennewick; Ramada Inn-Clover Island. The Board will be discussing responses to the Board's advice on FY 1995 budget reallocation, proposal on chair selection, off-site waste acceptance, medical isotope separation as an instance of economic transition, tracking system for environmental restoration, and the Board's budget and integrated work plan.  <i>Members of the public are encouraged to attend Hanford Advisory Board meetings. All meetings are open to the public and time is available to give public comment.</i>	Elaine Hallmark (503) 243-2663
January 6	Hanford Advisory Board Public Involvement Committee meeting. Kennewick; Ramada Inn-Clover Island. 8:30 a.m. to 4:30 p.m. <i>Chair: Marilyn Reeves.</i>	Mary Forst (503) 243-2663
January 6	Hanford Advisory Board Major Safety and Waste Management Committee meeting. Kennewick; Ramada Inn-Clover Island. 9:00 a.m. to 4:00 p.m. <i>Chair: Dick Belsey.</i>	Paul Wilson (503) 245-1481
January 12-13 Tentative	Technical Steering Panel of the Dose Reconstruction Project public meeting. Pasco; Red Lion Inn. Public meeting is scheduled for the 12th, 7:00 p.m. to 9:00 p.m.	Greg Combs (206) 407-7116
<b>FEBRUARY</b>		
February 1	Facility Wide Permit proposed modifications public hearing. The agencies will be seeking public comment on proposed modifications to the Hanford Facility Wide RCRA Hazardous Waste Treatment, Storage, and Disposal Permit. Kennewick; Department of Ecology office; 1315 West 4th Avenue. 7-9 p.m.	Moses Jaraysi (509) 736-3016
February 2-3	Hanford Advisory Board meeting. Pasco; Red Lion Inn. Agenda to be determined. 8:30 a.m. to 4:30 p.m.  <i>Members of the public are encouraged to attend Hanford Advisory Board meetings. All meetings are open to the public and time is available to give public comment.</i>	Elaine Hallmark (503) 243-2663
February 3	Hanford Advisory Board Public Involvement Committee meeting. Pasco; Red Lion Inn. 7:15 a.m. to 8:30 a.m. <i>Chair: Marilyn Reeves.</i>	Mary Forst (503) 243-2663
February 10	Hanford Advisory Board Major Safety and Waste Management Committee meeting. Seattle; Windham Gardens Hotel. 9:00 a.m. to 3:30 p.m. <i>Chair: Dick Belsey.</i>	Paul Wilson (503) 245-1481
February Tentative	Facility Transition Negotiations. TPA public meetings on Facility Transition Negotiations. Dates, times, and locations to be determined.	Paul Krupin (509) 372-1112

**MARCH**

March 2	Hanford Advisory Board meeting. Seattle; Executive Inn-Best Western. Agenda to be determined. 8:30 a.m. to 4:30 p.m.	Elaine Hallmark (503) 243-2663
	<i>Members of the public are encouraged to attend Hanford Advisory Board meetings. All meetings are open to the public and time is available to give public comment.</i>	
March 3	Hanford Advisory Board Major Safety and Waste Management Committee meeting. Seattle. <i>Chair: Dick Belsey.</i>	Paul Wilson (503) 245-1481
March Tentative	Draft Hanford Remedial Action Environmental Impact Statement. USDOE public meetings. Richland, Portland, Seattle. Dates, times, and locations to be determined.	Sue Weissberg (509) 372-0188

**Public Comment Periods**

April 4- December 31	C-018, Preliminary Notice of Application. Ecology is accepting public comment now on the issues to be considered in the draft wastewater discharge permit.	Melodie Selby (509) 736-3021
July 24- December 31	400 Area Secondary Cooling Water Wastewater Discharge Permit Notice of Application. Ecology is accepting public comments on the issues to be considered in the draft wastewater discharge permit. Formal public comment on the draft permit will be solicited during the last quarter of 1994.	Melodie Selby (509) 736-3021
October 17- March 30	200 Area Treated Effluent Disposal Facility (Project W-049H) Notice of Application for a Wastewater Discharge Permit. Ecology is accepting public comments on the issues to be considered in the draft wastewater discharge permit. Formal public comment on the draft permit will be solicited in the first quarter of 1995.	Joanne Chance (206) 407-7139
January 9- March 9	Facility Wide Permit proposed modifications. The agencies will be seeking public comment on proposed modifications to the Hanford Facility Wide RCRA Hazardous Waste Treatment, Storage, and Disposal Permit.	Moses Jaraysi (509) 736-3016
January 23- March 8 Tentative	Facility Transition. The TPA agencies will be seeking public comment on proposed changes to the milestones for Facility Transition under the TPA.	Paul Krupin (509) 372-1112

Every effort has been made to list correct information, but dates, times, and locations for particular meetings may change. For more information, please call 1-800-321-2008 or any of the following Tri-Party Agreement agency public involvement contacts:

U.S. Department of Energy: Jon Yerxa at (509) 376-9628  
 U.S. Environmental Protection Agency: Dennis Faulk at (509) 376-8631  
 Washington State Department of Ecology: Laurie Davies at (206) 407-7113

The Tri-Party Agencies are equal opportunity and affirmative action employers.

If you have special accommodation needs, contact Michelle Davis (206) 407-7126 (voice) or (206) 407-6206 (TDD).

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UPCOMING TRI-PARTY AGREEMENT  
PUBLIC INVOLVEMENT ACTIVITIES

December 20, 1994

--DRAFT--

RCRA PERMIT PUBLIC COMMENT PERIOD/MEETINGS	Jan/Feb timeframe
FACILITIES TRANSITION PUBLIC MEETINGS	Feb/March timeframe
100 AREAS PROPOSED PLAN PUBLIC COMMENT PERIOD/MEETINGS (100-HR-1, 100-DR-1, 100-BC-1)	Feb/March timeframe
TPA ANNUAL PUBLIC MEETINGS/BUDGET MEETINGS	March timeframe
100 AREAS PROPOSED PLAN PUBLIC COMMENT PERIOD/MEETINGS (100-HR-3, 100-BC-5, 100-KR-4)	March/April timeframe
W-049 PERMIT PUBLIC COMMENT PERIOD/MEETINGS	March/April timeframe
<del>300</del> <sup>300</sup> AREA LIQUID EFFLUENT TREATMENT PUBLIC COMMENT PERIOD	March/April timeframe