

River and Plateau Committee

Topic: The Public Involvement Process During Aging Structure Stabilization Actions

Authors: Tom Sicilia, Liz Mattson, Jan Catrell, Shelley Cimon, Pam Brown-Larsen, Marissa Merker, Rob Davis, Vince Panesko, Gerry Pollet, Helen Wheatley

Originating Committee: RAP Committee

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Background

The mission at Hanford shifted from plutonium production to cleanup more than thirty years ago, and the remaining facilities and structures are showing their age. These aging structures present an evolving need to conduct unplanned stabilization or demolition to protect workers and prevent a release to the environment. The nature of each aging structure, the protective action, the level of contamination, and the associated regulatory framework vary widely across the Hanford Site.

The Hanford Advisory Board (HAB; The Board) appreciates that DOE has a desire, responsibility, and obligation to protect its workforce, the health of the general public, and prevent releases to the environment. We also recognize that there are instances which require rapid response to fulfill that obligation. It is absolutely critical that DOE has the ability to take actions to protect workers and prevent a release of contamination.

The Board is invested in a consistent public involvement process that prioritizes transparency and meaningful engagement even as DOE responds to unanticipated cleanup and stabilization challenges. The Board supports an approach that ensures that the DOE chooses the appropriate administrative action to address immediate risks while also allowing an appropriate level of public comment and regulatory review. Of special interest in this advice is the comparison of time-critical and non-time critical removal actions. Stabilizations conducted under Time-Critical actions provide less information for public review and input.

Three waste sites near the Plutonium Finishing Plant (PFP) are currently scheduled to undergo expedited stabilization or removal activities as CERCLA Time Critical Removal Actions (TCRAs). TCRAs require less analysis of lifecycle costs and alternatives than a Feasibility Study associated with a remedial action or an Engineering Evaluation/Cost Analysis (EE/CA) associated with a Non-Time Critical Removal Action. The Board has reviewed a number of recent stabilizations as well as the current time-critical proposal to stabilize aging underground structures adjacent to the PFP. A more thorough public involvement process with site-specific information and deliberation provides a better grounding for evaluating the proposed action.

We suggest improvements that the Tri-Party Agreement (TPA) agencies can adopt in order to effectively communicate strategies for addressing emergent risks while

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providing meaningful community and stakeholder participation. As such, we offer the following advice:

Advice

1. The Board advises DOE to default to Non-Time Critical Removal Actions or Remedial Actions, as is standard in the National Contingency Plan and statute¹ unless a release or failure has occurred or is imminent.
2. The Board advises DOE to complete site-specific deliberation prior to implementing interim actions to ensure that the anticipated final remedy will still be achievable. This process is of particular interest in the case of waste sites with a legal obligation under a Record of Decision.
3. The Board advises that public and stakeholders be involved earlier in the planning process to ensure that input is gathered prior to selecting stabilization or remediation alternatives. The public information should document that necessary analyses and deliberations were completed prior to selecting preferred alternatives for a stabilization action.
4. The Board advises the agencies to evaluate additional alternatives for the three sites near PFP, including temporary covers, adding layers of sand to prevent releases, or expediting remedial actions.
5. The Board advises DOE to make available any and all assessments or documents utilized to support the decision process and selection of alternatives. The identified documents should be made available on the website page related to the decision or comment period, including a link provided in relevant fact sheets.

¹ 40 CFR 300.415(b)(4): “Whenever a planning period of at least six months exists before on-site activities must be initiated, and the lead agency determines, based on a site evaluation, that a removal action is appropriate: (i) The lead agency shall conduct an engineering evaluation/cost analysis (EE/CA) or its equivalent. The EE/CA is an analysis of removal alternatives for a site.”

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Stabilization Under Non-Time Critical Removal Action

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