

# *Community Relations Plan*

A guide to CERCLA public involvement in the cleanup program at the INEEL

**Idaho  
Completion  
Project**

Bechtel BWXT Idaho, LLC

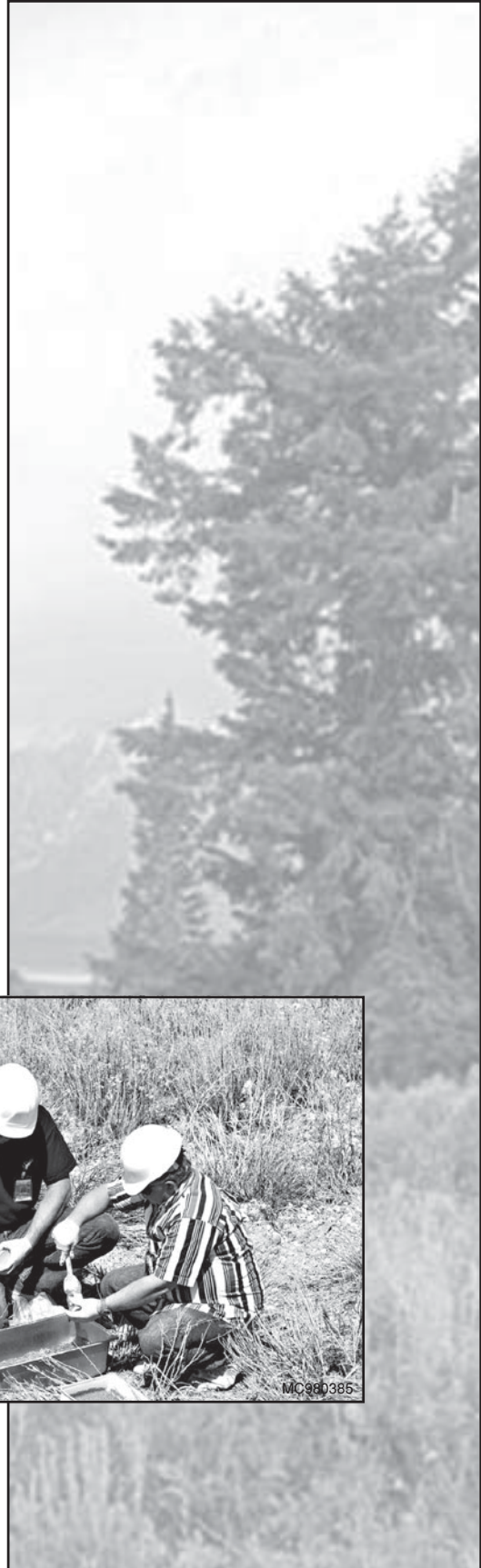
*To the reader:*

This Community Relations Plan, a revision to the 1995 plan, addresses public involvement in CERCLA remediation activities at the Idaho National Engineering and Environmental Laboratory (INEEL) site. The plan plays an important role in identifying the range of activities in which you can participate during the remediation process.

The Community Relations Plan is just one part of a wider effort to inform and involve the public in the broad range of cleanup work at the INEEL.

The process for addressing remediation concerns was mutually agreed upon by the U.S. Department of Energy, the U.S. Environmental Protection Agency, and the state of Idaho. These agencies are committed to providing public involvement activities that provide unbiased information and a direct link between your comments and agency cleanup decisions. Key community concerns about the Department of Energy's public involvement program are addressed in this plan.

Your input on activities will influence the types of information and public involvement opportunities the agencies provide. The Community Relations Plan establishes the basis for public and agency interaction as the CERCLA remediation process moves toward completion.



***The Agencies***

**U.S.  
Department  
of Energy**



**U.S.  
Environmental  
Protection  
Agency**



**Idaho  
Department of  
Environmental  
Quality**



*Workers collect soil samples near the Test Reactor Area*





Contents	iii
<b>I. Overview</b>	<b>1</b>
<b>What is the Community Relations Plan?</b>	<b>1</b>
<b>Why is the plan needed?</b>	<b>2</b>
<b>Objectives of the Community Relations Plan</b>	<b>3</b>
<b><i>CHART: What is the relationship between CERCLA and other cleanup at the INEEL?</i></b>	<b>3</b>
<b>II. Shifting the focus to completion</b>	<b>4</b>
<b>Accelerated cleanup</b>	<b>5</b>
<b>What happens after cleanup work is completed?</b>	<b>6</b>
<b>A brief history of cleanup at the INEEL</b>	<b>7</b>
<b><i>MAP: The Snake River Plain Aquifer</i></b>	<b>8</b>
<b>Early assessment of the INEEL</b>	<b>9</b>
<b>INEEL cleanup and the Settlement Agreement</b>	<b>9</b>
<b>III. The process of cleaning up</b>	<b>10</b>
<b>The Federal Facility Agreement and Consent Order</b>	<b>10</b>
<b>Agency roles</b>	<b>10</b>
<b>How does DOE find contaminated sites?</b>	<b>11</b>
<b>Defining “cleanup” and “remediation”</b>	<b>12</b>
<b>The FFA/CO Action Plan</b>	<b>12</b>
<b><i>MAP: INEEL facilities and waste area groups</i></b>	<b>13</b>
<b>Waste area groups and operable units</b>	<b>14</b>
<b>The Superfund process</b>	<b>14</b>
<b>1. Investigation</b>	<b>14</b>
<b>2. Decision</b>	<b>15</b>
<b><i>CHART: Roadmap of the CERCLA process</i></b>	<b>15</b>
<b>3. Design</b>	<b>16</b>
<b>4. Action</b>	<b>16</b>
<b>5. Operation and maintenance</b>	<b>16</b>
<b>Removal actions</b>	<b>17</b>
<b>The five year review process</b>	<b>17</b>





<b>IV. Public involvement</b>	<b>18</b>
<b>DOE's commitment to involvement</b>	<b>18</b>
<b>The affected community</b>	<b>19</b>
<i>CHART: What happens to public comment?</i>	<b>19</b>
<b>Community profile</b>	<b>20</b>
<b>Levels of public involvement</b>	<b>20</b>
<b>Key concerns and values</b>	<b>21</b>
<b>1. Protection of human health and the environment</b>	<b>21</b>
<b>2. DOE credibility and commitment to public involvement</b>	<b>22</b>
<b>3. State and EPA involvement</b>	<b>23</b>
<b>4. Effectiveness of public involvement activities</b>	<b>23</b>
<b>5. Effectiveness of communications and written material</b>	<b>24</b>
<b>6. Responsiveness</b>	<b>24</b>
<b>V. Appendices</b>	<b>25</b>
<b>Appendix A</b>	<b>25</b>
<b>Description of activities</b>	<b>25</b>
<b>Information activities</b>	<b>25</b>
<b>Involvement activities</b>	<b>27</b>
<b>Appendix B</b>	<b>29</b>
<b>Technical assistance grants</b>	<b>29</b>
<b>Appendix C</b>	<b>30</b>
<b>List of contacts</b>	<b>30</b>
<b>INEEL Information Repositories</b>	<b>30</b>
<b>Public reading room hours</b>	<b>30</b>

## I. Overview

### What is the Community Relations Plan?

The Community Relations Plan outlines public involvement programs of the U.S. Department of Energy to inform and involve the public in the remediation decision-making process under the Comprehensive Environmental Response, Compensation and Liability Act. The Community Relations Plan is intended to be a guide for the public on opportunities to get involved in the CERCLA remediation program at the INEEL. Remediation is a risk-based cleanup approach used for contaminated soil and water.

This document is a revision to the 1995 Community Relations Plan. The 1995 document was developed with the help of a focus group of citizens with diverse interests in cleanup activities.

The establishment of a Citizens Advisory Board, public comment on future land-use scenarios, criteria for prioritizing cleanup projects, and an environmental impact statement for INEEL site activities have also influenced public participation in the cleanup process.



Contaminated soil is removed from a site at the Central Facilities Area.

### Community Relations Plan

This plan was developed according to the EPA guidance document, *Community Relations in Superfund: A Handbook*, January 1992. The INEEL Information Repository contains a copy of the guidance (see Appendix C, page 30, for repository locations.)

**Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)**, CERCLA also known as the Superfund law, is a federal statute enacted in 1980 and reauthorized in 1986. It provides the authority for cleanup of hazardous substances that could endanger public health, public welfare, or the environment.

### National Priorities List

This is EPA's list of hazardous waste sites that require investigation and cleanup under the federal Superfund program.

**Citizens are always welcome to comment on public participation activities** by writing or calling the INEEL Community Relations Plan Coordinator, P.O. Box 1625, Idaho Falls, ID 83415-3940 at (208) 526-3183 or at (800) 708-2680.

Interested citizens may:

- Receive mailings (fact sheets, proposed plans, records of decision and postcard notices)
- Visit the INEEL website at <http://cleanup.inel.gov>
- Visit the INEEL Information Repository/Administrative Record collections (see Appendix C, page 30, for locations)
- Attend public meetings, open houses, workshops and briefings
- Submit oral or written comments during public comment periods
- Provide public input on feasibility study alternatives, remedial design and action phases, and revisions to the Community Relations Plan

## Why is the plan needed?

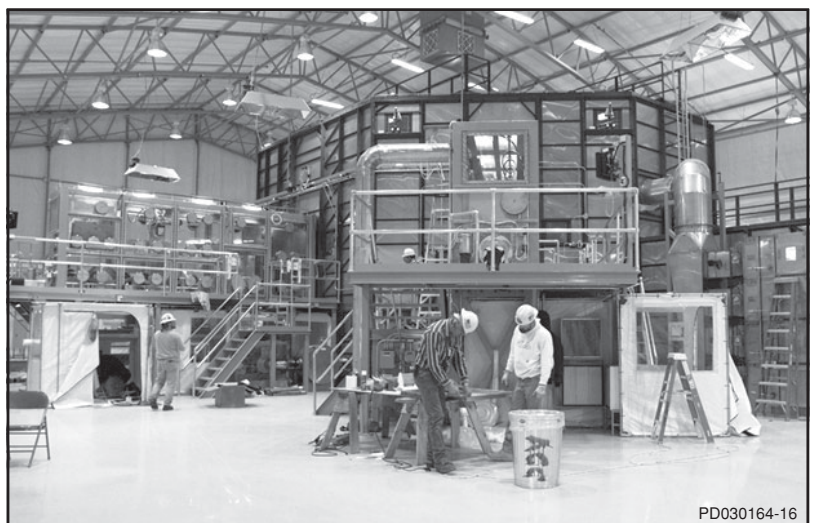
The INEEL is a National Priority List (Superfund) site under CERCLA due to confirmed releases of contaminants to the groundwater. DOE entered into a Federal Facility Agreement and Consent Order (FFA/CO) in 1991 with the EPA and the state of Idaho. This agreement provides the process for making remediation decisions for the INEEL.

A Community Relations Plan must be developed for every National Priority List site. The FFA/CO reaffirms this requirement. This Community Relations Plan fulfills the requirement to provide the public with a description of how information about CERCLA remediation can be accessed and how a citizen can be involved in the decision-making process.

In accordance with CERCLA requirements, DOE has been:

- 1) Investigating areas suspected of being contaminated
- 2) Identifying solutions for cleanup
- 3) Involving the public in the investigation and decision-making process
- 4) Obtaining concurrence from state and approval from EPA for federal facility remedial actions
- 5) Implementing the best course of action
- 6) Monitoring and maintaining completed remedial actions

The Community Relations Plan is just one part of a wider public involvement effort for cleanup work at the INEEL managed under the Idaho Completion Project. This work is done to meet the



*Workers put the finishing touches on the Glovebox Excavator Method facility at Pit 9 prior to beginning excavation in the pit at the Radioactive Waste Management Complex.*



requirements of many laws in addition to CERCLA – The Resource Conservation and Recovery Act (RCRA), the National Environmental Policy Act (NEPA), the Clean Air Act and other legislation also direct cleanup at the INEEL.

Besides the FFA/CO, which provides the framework for remediation of soil and water contamination from past INEEL missions, DOE is also party to the 1995 Settlement Agreement with the state of Idaho and the U.S. Navy, as well as several consent orders – binding agreements with the state of Idaho to ensure INEEL facilities are brought into compliance with RCRA regulations.

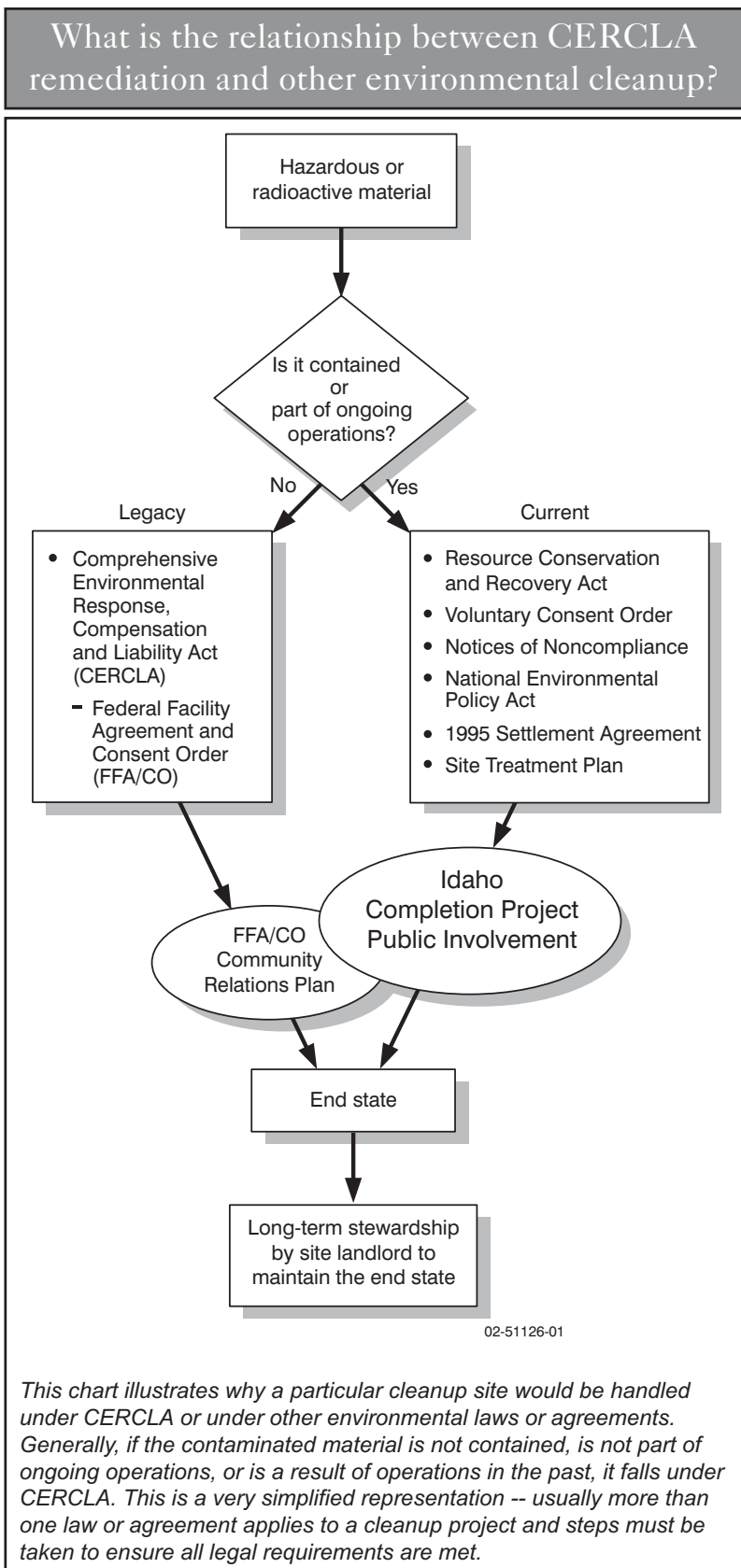
DOE has recently separated the management of the INEEL into two distinct functions. The name Idaho National Laboratory has been assigned to the function focused on research and development as well as development of future missions including nuclear energy.

The remaining cleanup function of the site and long-term management of spent nuclear fuel is now called the Idaho Cleanup Project. This function has the responsibility to meet DOE’s legal agreements and cleanup milestones.

### Objectives of the Community Relations Plan

- Describe different methods of public participation and how citizens can become involved in key decisions during the CERCLA remediation process
- Identify public concerns and address differing points of view on health and environmental issues, credibility, written materials and involvement activities

Citizens are invited to identify their concerns and offer suggestions to improve the Community Relations printed material and





### Waste Types at the INEEL

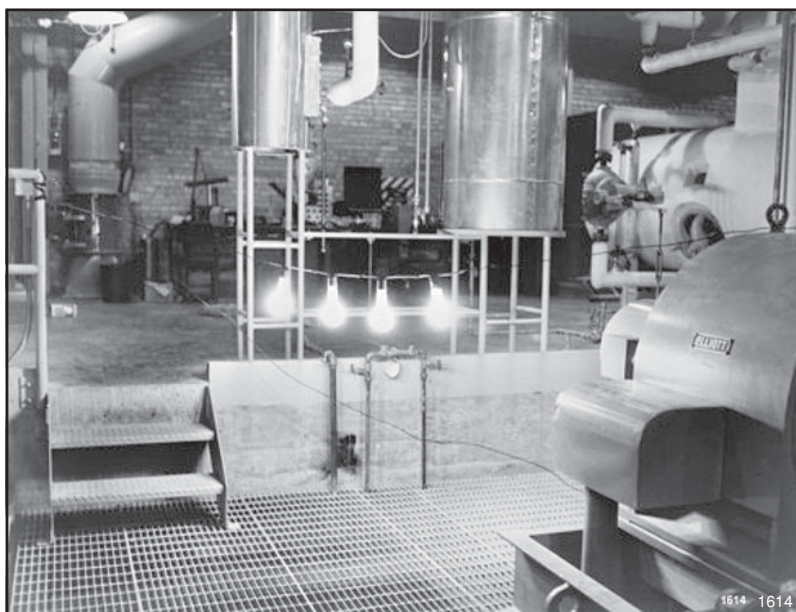
- **Industrial waste** – solid sanitary wastes which aren't hazardous or radioactive, like paper, cardboard and wood, similar to waste found in municipal landfills.
- **Hazardous waste** – includes items such as heavy metals and industrial solvents like carbon tetrachloride and PCB waste.
- **Radioactive waste** – includes unusable materials contaminated with radioactive particles that emit ionizing radiation (energy) and are further characterized as:
  - **Transuranic waste**, emitting alpha particles, having an atomic weight greater than uranium, a half-life greater than 20 years, and a concentration exceeding 100 nanocuries per gram.
  - **Alpha low-level waste**, emitting alpha particles, and having a concentration of transuranic elements over 10 but below 100 nanocuries per gram.
  - **High-level waste**, highly radioactive waste resulting from the reprocessing of spent nuclear fuel, including liquid waste produced directly from processing and any solid material derived from such liquid waste.
  - **Low-level waste** does not meet the definitions for high-level, transuranic, spent nuclear fuel or by-product materials.
- **Mixed waste** – includes unusable materials that contain both hazardous and radioactive contaminants.

public meetings to better meet their needs. To make these suggestions, contact the INEEL's Community Relations Plan coordinator. Contact information is listed in Appendix C of this plan (page 30).

## II. Shifting the focus to completion

The investigation phase of contaminated and potentially contaminated sites at the INEEL is coming to a close. Of the many site investigations originally identified, only a few remain. The remaining investigations are by far the most complex and have been the focus of most stakeholder comments and concerns over the years. These include completion of the investigation for the Subsurface Disposal Area and High-Level Waste Tank Farm, as well as final integration of all information available on contamination of the Snake River Plain Aquifer. Small areas of contamination continue to be identified as buildings are removed. These areas are listed as new sites under the FFA/CO.

The records of decision for all other remediation projects at the INEEL site have been signed, and the remediation activities have either been completed or are currently ongoing. At the end of 2003, remediation to meet ROD requirements had been completed for the BORAX reactor area, the Test Reactor Area and the Central Facilities Area. Remediation of the Argonne National Laboratory-West area, Power Burst Facility, and Auxiliary Reactor Area is planned to be complete in 2004. Remediation of the Test Area North will be completed in 2007.



*Electricity was generated from nuclear power for the first time on Dec. 20, 1951 at the Experimental Breeder Reactor-I which is now a National Historic Landmark.*

## Accelerated cleanup

In May 2002, DOE, the Idaho Department of Environmental Quality, and the EPA Region 10 signed a letter of intent formalizing an agreement to pursue accelerated risk reduction and cleanup at the INEEL. The letter provides the foundation for a collaborative plan for completing the majority of the cleanup at the INEEL by 2012. This acceleration includes completion of waste management activities, including treatment and transport of transuranic waste to the Waste Isolation Pilot Plant in Carlsbad, New Mexico, and placing all spent nuclear fuel in dry storage as well as completion of CERCLA remediation.

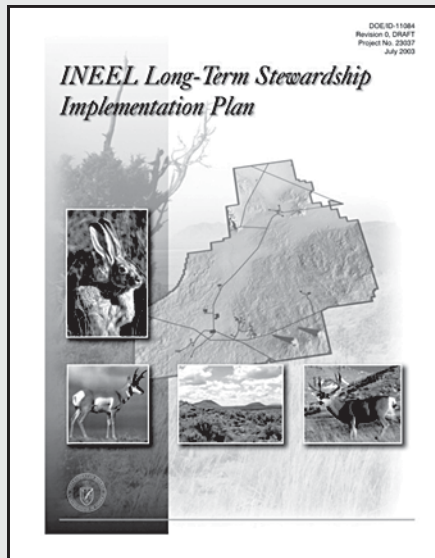
The DOE's Idaho Operations Office developed a Performance Management Plan to propose a significantly improved approach to our cleanup mission and the way we do business.

The vision for accelerating cleanup of the INEEL results in two objectives: 1) risk reduction and continued protection of the Snake River Plain Aquifer, and 2) consolidation of environmental management activities and reinvestment of savings into additional cleanup.



*Workers suit up prior to investigating a cleanup site north of the Idaho Nuclear Technology and Engineering Center.*

In the summer of 2003, the INEEL asked for input on implementing goals and objectives outlined in the INEEL Long-Term Stewardship Implementation Plan. The INEEL incorporated the comments into a final version of that plan, which was posted on the INEEL web page at <http://cleanup.inel.gov/stewardship>.



### What happens after cleanup work is completed?

The INEEL is continuing to develop its Long-Term Stewardship Program. Long-term stewardship refers to all activities necessary to ensure protection of human health and the environment following completion of active remediation, which may include waste removal and disposal, or stabilization of a site or a portion of a site.

The Long-Term Stewardship Program is responsible for maintaining the end state of cleanup sites that are no longer in use. In the case of CERCLA remediation sites, it means continuing to operate long-term remediation systems like aquifer pump-and-treatment operations and maintaining and monitoring barriers. CERCLA records of decision often establish institutional controls at some remediation sites. These controls describe land use restrictions that must be maintained until the residual risk reaches specified levels where control is no longer necessary. The Long-Term Stewardship program is responsible for maintaining these institutional controls.

The ongoing bioremediation and pump-and-treat systems at Test Area North are examples of sites where the program has already assumed the responsibility for continuing operation of a CERCLA remedy. The responsibility continues until remediation goals specified in the ROD are met.

The Long-Term Stewardship Program will also take responsibility for maintaining the end state of non-CERCLA cleanup at the INEEL, such as the empty spent nuclear fuel basins.

As cleanup projects are completed, there is a requirement to continue maintenance and monitoring to avoid any activity that could reduce the protectiveness of the remedy. The Long-Term Stewardship Program will ensure that these requirements are met and that institutional controls continue to protect people and the environment long after the cleanup mission is completed. The program will also maintain information about what hazards remain, so that informed decisions about land use and future missions can be made.

The INEEL's Long-Term Stewardship Program will remain after programs and projects are completed and will consolidate long-term monitoring and land-use commitments, manage and monitor residual waste, and maintain responsibility for natural and cultural resources. Creation of the program does NOT change any statutory obligations for the operation, maintenance, monitoring, institutional controls, or post-closure care identified in records of decision, Hazardous Waste Management Act/Resource Conservation and Recovery closure plans, or other agreements. Rather, creation of a Long-Term Stewardship Program is a way to implement post-cleanup responsibilities agreed to under a variety of regulations in a more efficient and focused way.



## A brief history of cleanup work at the INEEL

Past activities at the INEEL, have resulted in contamination of soil and groundwater. These activities included: nuclear energy research projects for generating electricity, portable power reactors, nuclear-powered aircraft and testing for commercial-type reactors; treatment of high-level liquid waste; spent nuclear fuel storage, processing, and research and development; Navy gunnery testing, naval training and examination of expended fuel from naval reactors; and the storage and disposal of hazardous and radioactive waste.

Some areas that were used for nuclear reactor research contain hazardous, radioactive and mixed waste types. Contaminants include asbestos, petroleum products, acids and bases, radionuclides and heavy metals. Sites where this contamination exists include injection wells, leaching ponds, underground storage tanks, and disposal pits.

Some sites used for spent nuclear fuel storage, processing, and research and development contain contaminants such as organics, asbestos, radionuclides, metals, corrosives, petroleum wastes and mixed wastes. These sites include spills, injection wells, storage areas, pits, tanks, buildings, contaminated soils, and French drains.



*A shipment of transuranic waste leaves the Radioactive Waste Management Complex for the Waste Isolation Pilot Plant in Carlsbad, New Mexico.*

### By any other name...

The name of DOE's Idaho lab has changed many times over the years to reflect the lab's changing missions.

1949 – The Atomic Energy Commission (DOE's predecessor) established the **National Reactor Testing Station**.

1974 – The facility name was changed to **Idaho National Engineering Laboratory**.

1997 – The facility name was changed to **Idaho National Engineering and Environmental Laboratory**.

DOE plans to change the name again to **Idaho National Laboratory** when it awards the new contract for the lab. Cleanup work is being handled separately under the name **Idaho Cleanup Project**.



### Snake River Plain Aquifer

An aquifer is a layer of water-saturated rock or soil through which water flows in a quantity useful to people. The Snake River Plain Aquifer flows southwestward from the area around Ashton, Idaho, to around King Hill, Idaho. The aquifer water moves through porous basalt and sedimentary interbeds and surfaces in a series of springs that flow into the Snake River. The Snake River Plain Aquifer and the Snake River are major agricultural, industrial and municipal water sources for southwestern Idaho.

The past storage and disposal of hazardous and radioactive waste at the Radioactive Waste Management Complex, established in 1952, has created a significant amount of concern. Waste generated by operations at the INEEL and other DOE sites, such as the Rocky Flats Plant in Colorado, was disposed here. Contaminants include radioactive, hazardous and mixed waste. The waste was disposed in soil vaults, pits and trenches, and on a waste disposal pad. The burial ground received transuranic waste until 1970 and still receives low-level radioactive waste. Probing in the burial ground has shown that many of the original waste containers are no longer intact. Monitoring is ongoing for contaminant releases to the air, vadose zone (the region from the ground surface down to the aquifer), surface water and groundwater.

Organic compounds exceeding drinking water standards have been detected in the **Snake River Plain Aquifer** near the Radioactive Waste Management Complex and near Test Area North. A cleanup project is currently ongoing to remove and destroy these organic

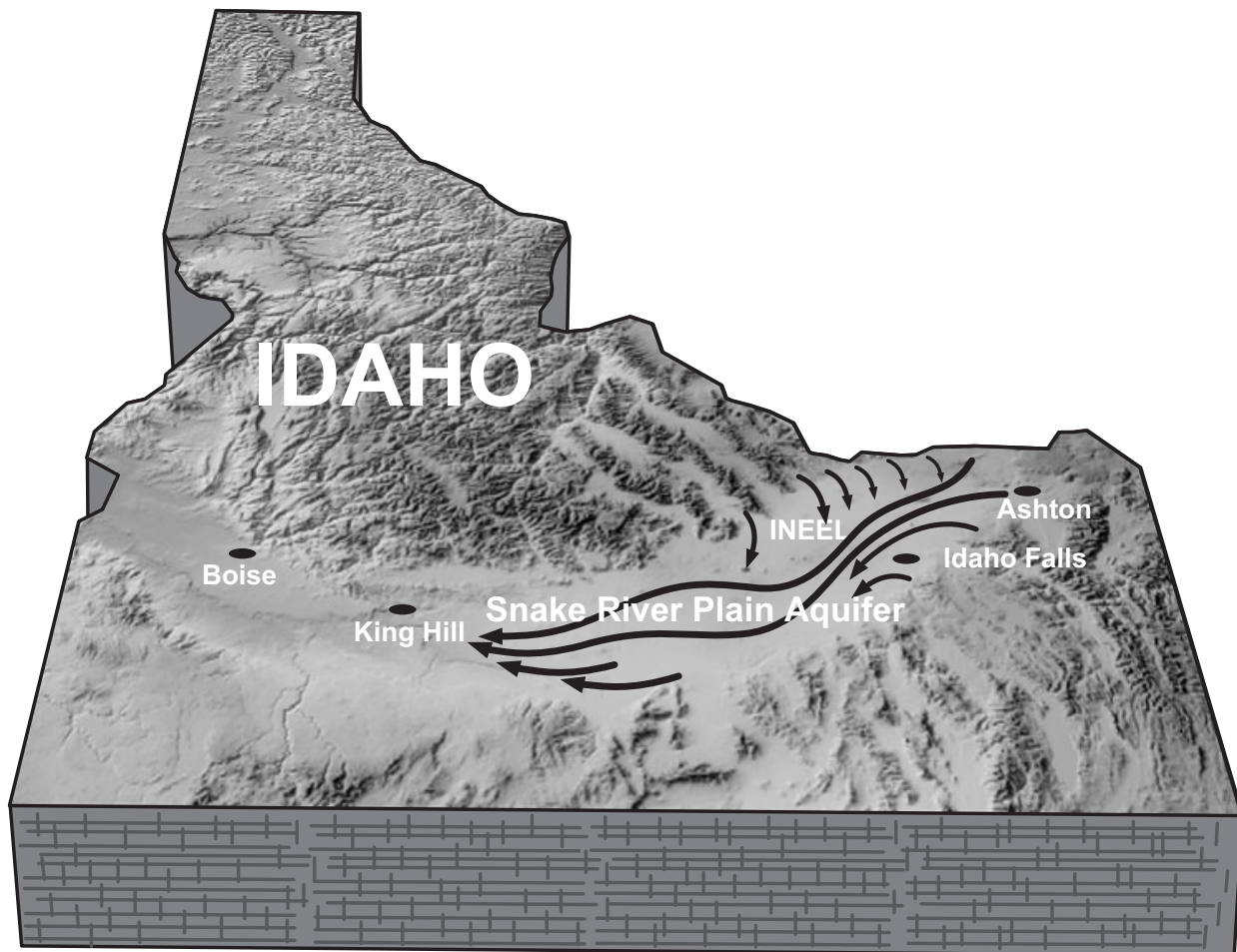


Figure 1. The Snake River Plain Aquifer flows in a southwesterly direction from Ashton to King Hill.

compounds from the ground over the aquifer. In order to independently monitor the groundwater, the state of Idaho INEEL Oversight Program and the U.S. Geological Survey take water samples from wells along the southern boundary of the INEEL. Several new groundwater monitoring wells have been installed near the Radioactive Waste Management Complex and within the Subsurface Disposal Area where the buried waste is located.

Groundwater treatment and/or monitoring is also under way for contaminants at Test Area North, the Test Reactor Area and the Idaho Nuclear Technology and Engineering Center. Several other groundwater monitoring wells, on- and off-site, are also independently monitored. Groundwater monitoring will continue to provide information on contaminant migration for the comprehensive environmental investigation.

### Early assessment of the INEEL

In 1987, the DOE, the EPA and the U.S. Geological Survey signed a Consent Order and Compliance Agreement under authority of RCRA. This agreement addressed compliance with regulations governing previous disposal of hazardous waste at the INEEL. The agreement contained a plan designed to achieve and maintain compliance with requirements that address the release or potential release of hazardous components. The plan called for investigation of all sites that may have been used to dispose of hazardous wastes, or that had possible spills of hazardous materials.

As a result of comprehensive assessments conducted under the 1986 Consent Order and Compliance Agreement signed by DOE, EPA and the U.S. Geological Survey, 368 potential waste units, ranging from fuel oil spills to pits containing radioactive contaminants, were identified. Early studies looked at sites routinely used to dispose of wastes, sites that were used occasionally, sites where accidental releases occurred, and areas thought to have been disturbed.

### INEEL cleanup and the settlement agreement

In 1995, the DOE, the state of Idaho, and the U.S. Navy signed an agreement that outlines specific milestones DOE must achieve regarding wastes currently stored at the INEEL. If DOE violates the terms of the agreement, the state of Idaho can ask a federal judge to impose fines and prevent future DOE spent fuel shipments to Idaho. The agreement states that the DOE, the EPA, and the state of Idaho will continue to implement the Federal Facility Agreement and Consent Order in concert with the Superfund law.

### **Resource Conservation and Recovery Act**

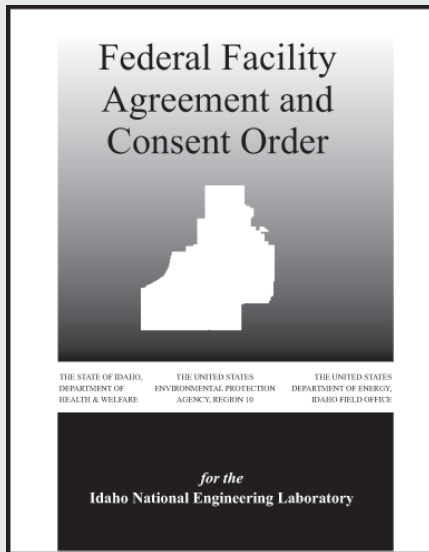
A federal law enacted in 1976 (and amended in 1980 and 1984) that regulates the generation, transportation, treatment, storage and disposal of hazardous wastes.

### **Consent Order and Compliance Agreement**

An agreement signed in 1987 by the DOE, the EPA and the U.S. Geological Survey that addressed compliance with Resource Conservation and Recovery Act regulations governing the past and current land disposal of hazardous waste at the INEEL. As a result of comprehensive assessments, 368 potential waste sites were identified. The agreement has since been superseded by the Federal Facility Agreement and Consent Order

### **National Environmental Policy Act**

Requires all federal agencies to assess potential environmental impacts of major proposed federal actions. These are actions that may significantly affect the quality of the human environment. DOE may prepare a categorical exclusion, an environmental assessment, or an environmental impact statement, depending upon the nature of a given project, or may integrate National Environmental Policy Act values into cleanup documents. It is DOE's policy to address these values in the cleanup process.



Citizens have raised questions about the quality of data used in investigations and how the state and EPA ensure quality. The agencies identify data quality objectives, which specify the quality of data required to support decisions in the cleanup program. The development of data quality objectives follows guidance in the Comprehensive Environmental Response, Compensation and Liability Act, the National Contingency Plan, and EPA documents. Existing data are used whenever data quality objectives are met or can be validated.

### III. The Process of Cleaning Up

#### The Federal Facility Agreement and Consent Order

In 1989, the INEEL was placed on the National Priorities List (Superfund) due to confirmed releases of contaminants to groundwater at the Radioactive Waste Management Complex, the Test Reactor Area and Test Area North. DOE, which manages the federal INEEL facility, was required to enter into negotiations for a federal facility agreement with the state of Idaho and EPA Region 10 as a result of this listing. The Federal Facility Agreement and Consent Order was signed by the agencies in 1991.

#### Agency roles

The responsibility for implementing the FFA/CO lies with project managers who represent the DOE, the EPA, and the state of Idaho. Under the FFA/CO, the state of Idaho and EPA play a role as partners to, and regulators of, DOE. The project managers or support staff meet or confer weekly on status during all phases of the remediation process. This coordinated effort leads to the development of work plans, investigation summaries, proposed remediation plans and other documents.

The FFA/CO empowers the state of Idaho Department of Environmental Quality and EPA Region 10 to ensure DOE and its contractors comply with federal and state environmental regulations for cleanup. EPA's power to ensure that DOE complies with federal and state regulations stems from environmental statutes and regulations under CERCLA and RCRA. The FFA/CO establishes one process to facilitate compliance. In general, the agreement is designed to:

- Establish procedures and a schedule for prioritizing, implementing, and monitoring remediation in accordance with applicable federal and state laws
- Expedite remediation as much as possible to protect human health and the environment
- Facilitate cooperation, information exchange, and participation between the agencies
- Minimize duplication of analyses and documentation

The FFA/CO is amended only in writing by the unanimous agreement of the three project managers (from DOE, EPA, and the state of Idaho). There are procedures in the FFA/CO to resolve disputes that arise between the agencies. As stated in the agreement, it is the agencies' intent to resolve issues with the first-level manager, and dispute resolution will be invoked only for significant issues.

## How does DOE find contaminated sites?

For workers or the public to be at risk now or in the future from contaminated areas at the INEEL, they must be exposed to contaminants at concentration levels that cause harm. Exposure could occur through ingestion, inhalation or absorption.

Under CERCLA, DOE conducts a series of investigations to determine the types and the amount of contamination. Potential release sites are investigated to determine if contamination exists. Record searches and personal interviews are conducted to obtain a list of possible contaminants.

After contaminants are identified, DOE conducts a risk assessment that evaluates potential risks to human health and the environment. In the remedial action, DOE examines ways people could come into contact with the contamination. DOE makes assumptions based on a scenario of a future resident living at the waste site, who drink the groundwater and uses contaminated soils and water to grow the food he or she consumes. The assumptions, based on EPA guidelines, allow DOE to determine the contaminants' risk to human health. If results show there is an unacceptable risk to human health based on exposure factors, DOE determines a course of action to reduce that risk. If risks are acceptable, no remedial action is taken.

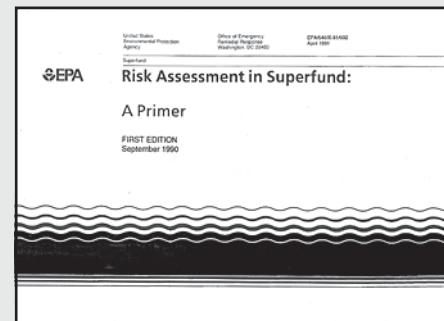
While DOE has responsibility for the investigation of the site and determination of the actions necessary to protect human health and the environment, the Idaho Department of Environmental Quality must concur with the results of the investigation and the selected action, and EPA must approve the investigation and action. The public also has a significant role in the selection of the cleanup action.

There has been a great deal of interest in recent months about "risk-based end states," a term that describes what a given cleanup site will look like upon completion of cleanup work. A residential scenario has been used to evaluate risk at INEEL sites, even though the current end state for site planning is continued government ownership and use of the entire site for at least another 100 years.

Institutional controls established by CERCLA records of decision are currently in place to protect workers from coming into contact with contaminants at waste sites. Cleanup remedies and institutional controls are subject to five-year reviews by the agencies to ensure they remain protective of human health and the environment. Specific site areas, such as the Idaho Nuclear Technology and Engineering Center and the Radioactive Waste Management Complex, will require government management and control in perpetuity. Protection of human health and the quality of the Snake River Plain Aquifer are primary concerns of the public and DOE.

To prioritize remedial investigations at the INEEL, the agencies considered:

- 1) Which sites posed an immediate threat to human health or the environment
- 2) Which sites already had a sufficient base of information to make a decision
- 3) Whether a technology existed that could be used for given site conditions



## Understanding Risks

Understanding risks ranks high among public concerns. Citizens have asked the agencies for more information about risk assessments. In response, the EPA published a guide for understanding risk, *Risk Assessment in Superfund: A Primer*. It is located in Binder 300 of the Information Repository (see Appendix C, page 25, for repository locations), or it can be obtained by calling the EPA at (206) 553-6901.



### Status of Interim Actions

All interim actions identified in the action plan of the FFA/CO have been started. Some have already been completed; others are in the remedial design phase or the remedial action phase. These include actions at the following operable units:

- Test Reactor Area Warm Waste Pond (completed)
- Power Burst Facility Chemical Evaporation Pond (completed)
- Unexploded ordnance locations (in progress)
- Pit 9 at the Radioactive Waste Management Complex (Stage II is scheduled to be complete by March 31, 2004; Stage III is still in the design phase)
- Tank Farm soils at the Idaho Nuclear Technology and Engineering Center (in early stages of implementation)

Interim actions were identified for these operable units because enough information existed to conclude that the extent of contamination posed a potential near-term threat to human health or the environment, or because implementation would expedite final cleanup of the site.

### Defining 'cleanup' and 'remediation'

While most investigations are completed or well under way, it is helpful to understand the full cleanup process, starting with the investigation phase. Cleanup laws and regulations often use words such as remediation, investigation and feasibility study. This Community Relations Plan will most often use the word "cleanup" to mean the broad responsibility to manage legacy waste and contamination and the word "remediation" to mean the specific CERCLA actions, including:

- Identifying the nature and extent of contamination and associated risks
- Identifying and analyzing possible remediation alternatives
- Involving the public in choosing a remedy from the alternatives
- Performing engineering design work
- Taking actions in the field

Cleanup may be done under CERCLA or RCRA. All cleanup actions ensure that enough of the contaminant has been removed so that the remaining contamination will not present an unacceptable risk to people or the environment. Cleanup doesn't mean all traces of a contaminant at a site are removed; doing so is not possible. Facility closure decontamination and decommissioning work may be considered remedial actions under CERCLA or may be completed under RCRA.

Cleanup also means taking action at a waste site to protect human health and the environment. The range of actions can vary greatly from no action to intensive site construction and removal activity depending on the risk posed by exposure to contaminants.

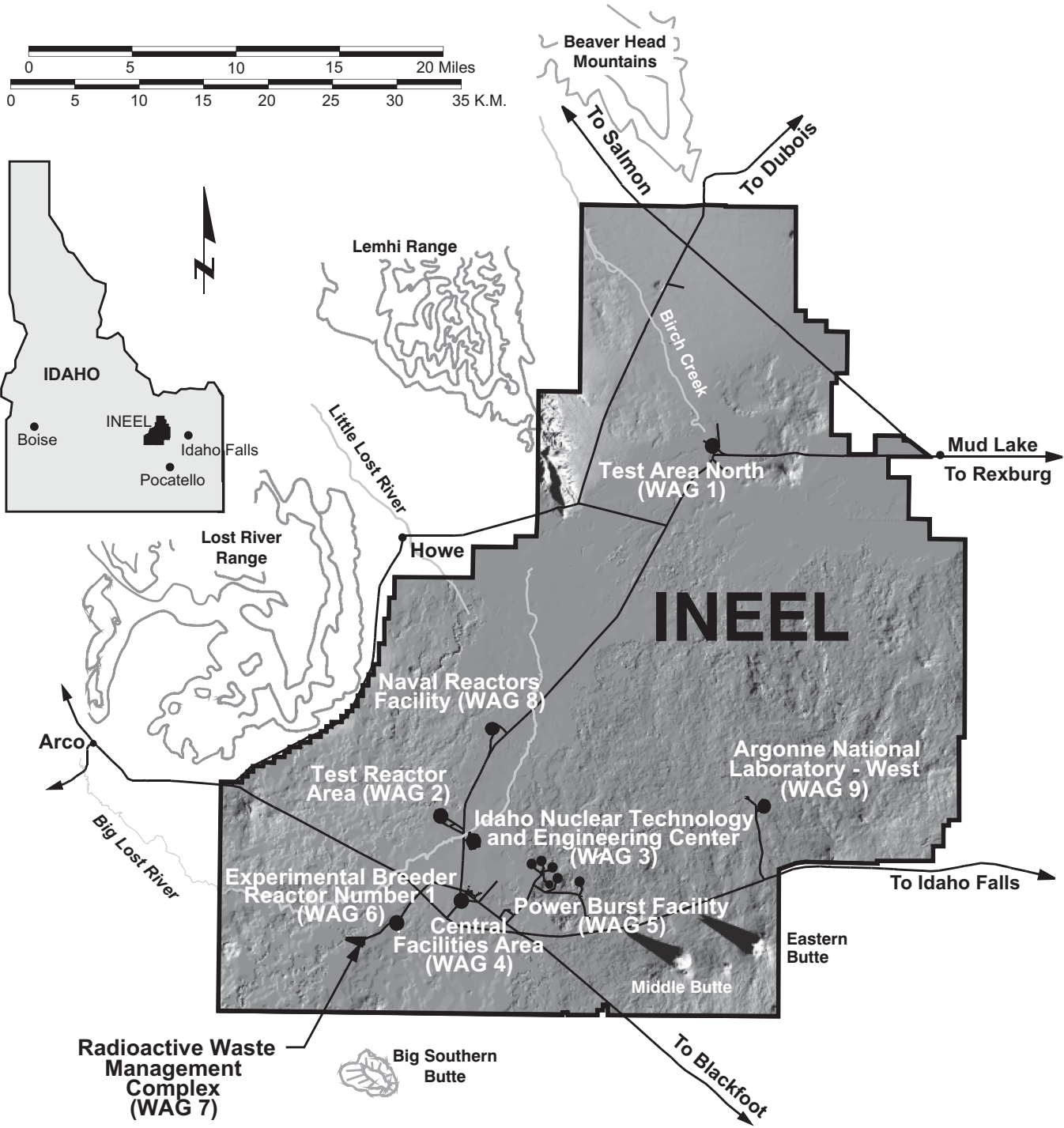
Where appropriate during phases of the process, it is the policy of DOE to incorporate values of the National Environmental Policy Act. The CERCLA process is legally equivalent to the National Environmental Policy Act process.

### The FFA/CO Action Plan

The FFA/CO outlines the Superfund remedial response process for the INEEL and includes an action plan. The action plan contains the procedures and schedule by which the agencies agree to investigate potential release sites.

A fundamental goal of cooperative efforts by the agencies in implementing the action plan is to emphasize remedial action. This goal recognizes that no reasonable amount of investigation can resolve all uncertainty and that remedial actions must accommodate changes from what was originally expected.

# INEEL Facilities and Waste Area Groups



A waste area group, or WAG, is one of 10 administrative management areas established under the FFA/CO. An operable unit is a grouping of potential or confirmed release sites with similar contamination problems within a waste area group.

### **INEEL Waste Area Groups (WAGs)**

WAG 1 – Test Area North

WAG 2 – Test Reactor Area

WAG 3 – Idaho Nuclear Technology and Engineering Center

WAG 4 – Central Facilities Area

WAG 5 – Power Burst Facility, Auxiliary Reactor Area

WAG 6 – Boiling Water Reactor sites, Experimental Breeder Reactor I

WAG 7 – Radioactive Waste Management Complex

WAG 8 – Naval Reactors Facility

WAG 9 – Argonne National Laboratory-West

WAG 10 – Snake River Plain Aquifer and Miscellaneous Sites

When major changes to a remediation remedy are needed, an amendment to the record of decision is required. The public is offered an opportunity to review and comment on the proposed plan that leads to the amendment. A proposed plan is written and public meetings are held to present the range of alternatives to the public. After a comment period, public input is considered by the agencies as they make their final decision on the remediation alternative.

When the agencies agree that only minor changes to a remedy are needed, the public is notified through publication of an Explanation of Significant Differences document. Such an approach encourages timely selection of a remedy, flexibility for remedial action, and the ability to respond to information discovered during investigations.

#### Waste area groups and operable units

The FFA/CO divided the INEEL into 10 waste area groups, each containing a number of areas potentially contaminated with hazardous waste. Waste Area Groups 1 through 9 correspond to facility areas at the INEEL. Waste Area Group 10 corresponds to site-wide concerns and includes the Snake River Plain Aquifer. Contaminated areas found after a record of decision is signed are included in Waste Area Group 10.

Waste area groups are further broken down into operable units to provide greater management efficiency as defined in the National Contingency Plan. All potential release sites identified in the agreement are accounted for in an operable unit.

During negotiations of the FFA/CO, the agencies categorized some sites as “No Further Action” sites. A “No Further Action” designation was made if it was determined that no hazardous substances were released, or if an approved summary assessment (under the Consent Order and Compliance Agreement) existed and there was no evidence of radiological contamination.

#### The Superfund process

The technical process of Superfund or CERCLA remedial actions can be broken into the following five phases: investigation, decision, design, action, and operation and maintenance.

##### 1. Investigation

During the investigation phase, the agencies work together to identify remedial action objectives, define the nature and extent of contamination, and develop a baseline risk assessment. These remedial investigation reports are technical studies that undergo rigorous review by the agencies to ensure technical completeness and adequacy for decision-making purposes. The information

generated during the remedial investigation is used to evaluate the risk posed by the site and select a remedial action, if required, from a range of alternatives presented in a feasibility study.

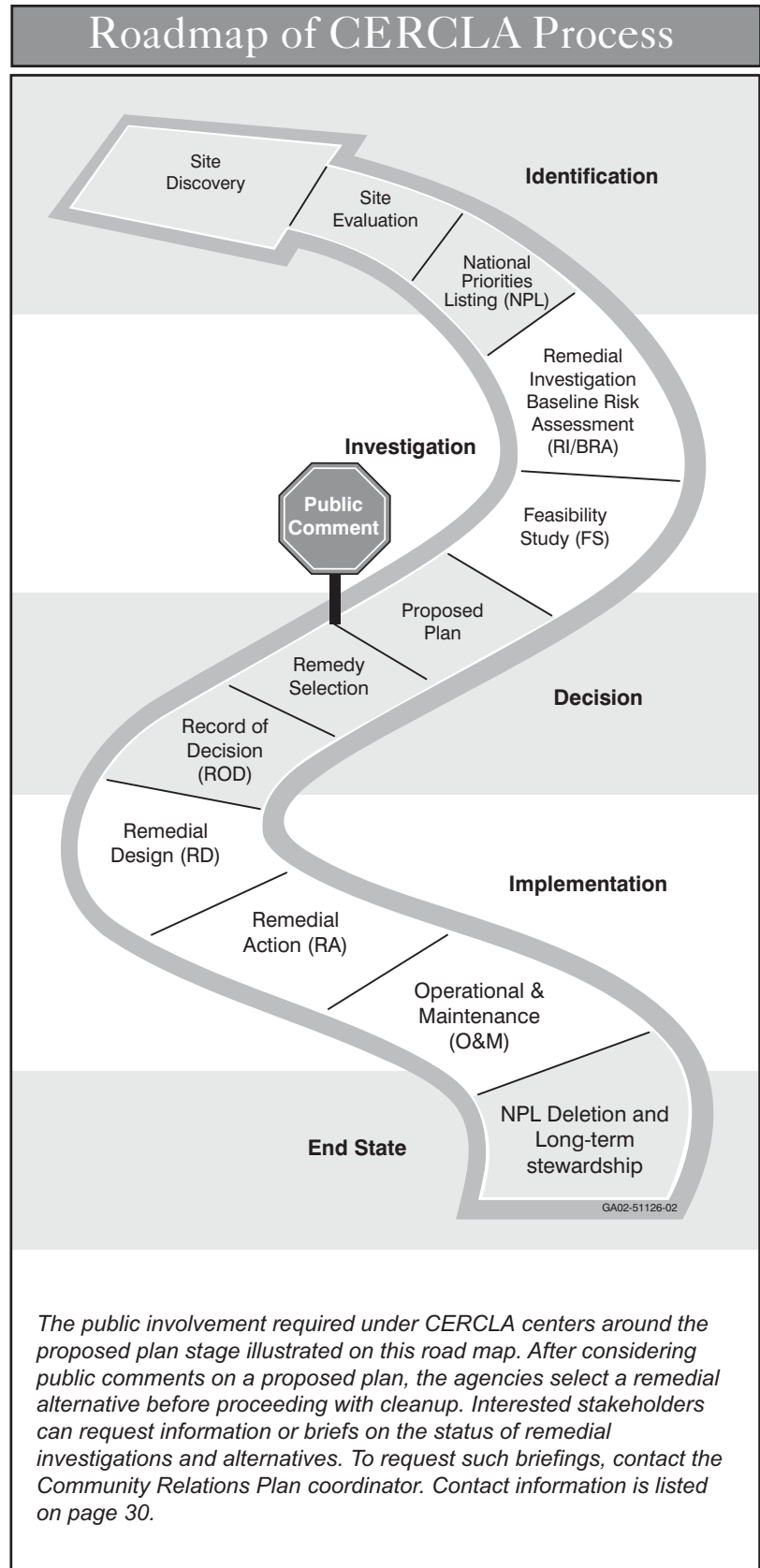
The remedial investigation includes sampling and monitoring in the field to gather enough information to define the extent of contamination and the risk to human health and the environment. Based on the results of the investigation, the need for remediation can be determined. A feasibility study, based on information from the remedial investigation, identifies and evaluates the cleanup alternatives and provides sufficient information for the remedy to be selected. A feasibility study results in an analyzed list of cleanup alternatives for a particular operable unit. The remedial investigation and feasibility study often overlap.

An interim action is initiated to address an immediate threat or when the problem is well defined and does not need a detailed remedial investigation/feasibility study. A brief investigation is conducted to determine an appropriate cleanup technology to mitigate risk posed by a site. The interim action is then incorporated into the final remedial action for the area.

## 2. Decision

When the remedial investigation/feasibility study or interim action investigation is completed, DOE prepares a proposed plan that includes the results of the remedial investigation, risk assessment, and analysis of alternatives considered. The state and EPA review the proposed plan during development. After the agencies agree to the content of the proposed plan, including the cleanup alternatives and the preferred alternative, the proposed plan is distributed to the public.

After the proposed plan for a cleanup project is distributed to the public, at least



*The public involvement required under CERCLA centers around the proposed plan stage illustrated on this road map. After considering public comments on a proposed plan, the agencies select a remedial alternative before proceeding with cleanup. Interested stakeholders can request information or briefs on the status of remedial investigations and alternatives. To request such briefings, contact the Community Relations Plan coordinator. Contact information is listed on page 30.*





one public meeting is held to allow members of the public to meet with agency representatives to directly provide their input on the remediation alternatives. The public meeting is held during a 30-day public comment period following the release of a proposed plan. The agencies review and consider the public's comments, then DOE drafts the record of decision. EPA and the state review and comment on the record of decision, and when all three agencies are in agreement, all three sign it. The agencies' responses to public comments are incorporated in the responsiveness summary of the record of decision. The final record of decision is then placed in the Administrative Record and made available to the public.

The public comment sessions built into the CERCLA process constitute the primary means for stakeholders to provide input on the cleanup remedy chosen for CERCLA cleanup sites.

#### 3. Design

During the remedial design phase, the agencies collectively determine the scope of the design, applicable guidelines for worker safety, and details concerning the cleanup levels that were established in the record of decision. The agencies also determine the engineering design (including schedule, cost estimates, and disposal options for wastes generated) and ensure that all activities comply with applicable standards in state and federal laws.

#### 4. Action

Remedial action is the actual construction or implementation phase that follows the remedial design of the selected cleanup alternative at a site. Remedial actions are the series of steps taken to reduce, control, or monitor the actual or potential release of contamination. The action and cleanup goals are identified in the record of decision. The agencies evaluate and monitor work to determine the effectiveness of the action and whether the cleanup requirements are being met.

#### 5. Operation and maintenance

Following the completion of remedial action activities, the EPA and state review the remedy every five years or sites where the remedial action leaves hazardous substances, pollutants, or contaminants on-site. These activities take place during operation and maintenance. Five-year reviews continue until no hazardous substances, pollutants, or contaminants remain at a site above levels that would allow for unlimited use and unrestricted exposure.

### Removal Actions

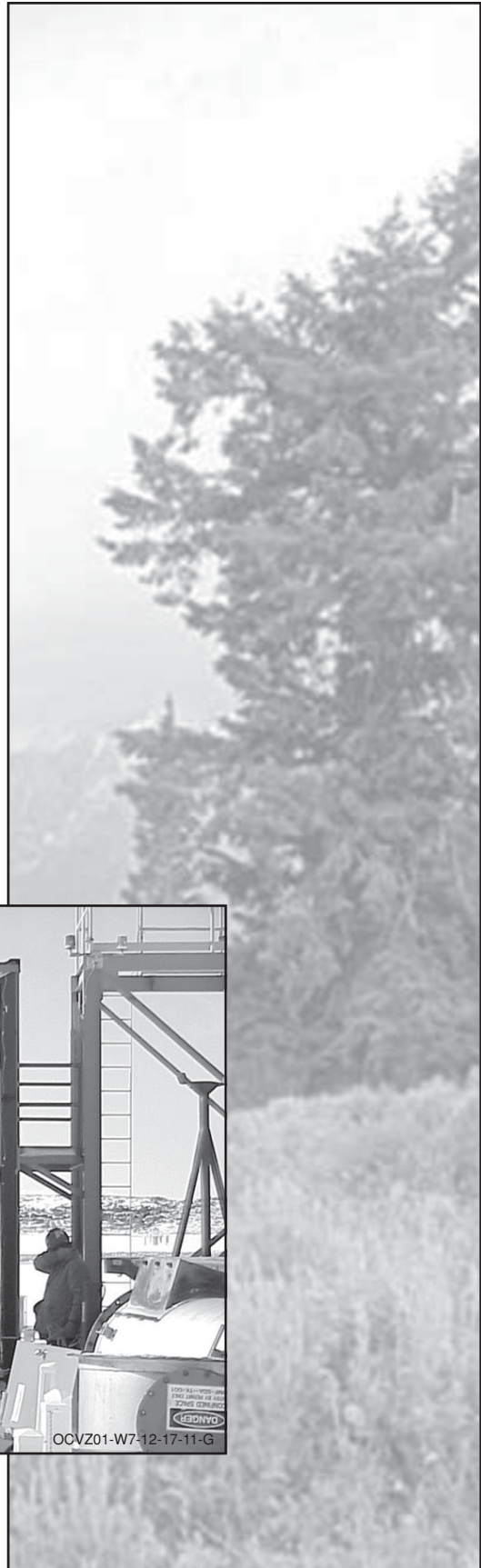
Superfund Section 104 provides broad authority for a federal program to respond to releases of hazardous substances, pollutants or contaminants. The two major types of response actions are remedial actions that are a result of the technical process described in the previous section and removal actions. Removal actions are taken to provide a permanent remedy to mitigate a long-term threat, a removal action responds to more immediate threats, is limited in scope and cost, and may be temporary.

INEEL is using Non-Time Critical Removal Action authority to accelerate the decontamination and dismantling of no-longer-used facilities and to accelerate other appropriate activities to reduce risk. To ensure that citizens have access to information when Non-Time Critical Removal Actions are taken, DOE will publish Emergency Evaluations and Cost Analysis documents and, when appropriate, hold public meetings.

### The five-year review process

The community is notified of the five-year review of a site prior to, or immediately following, the review process. The notification (fact sheet or public notice) states whether the review is a statutory or policy review and where copies of the report can be obtained. According to the National Contingency Plan, the report must be located in the site information repository.

In CERCLA regulations, if a site is cleaned up prior to the first five-year review and it is determined that a five-year review is not necessary, this finding will be made available for public comment in a decision document such as a subsequent record of decision, record of decision amendment or Notice of Intent to Delete. This has not happened at the INEEL.



*At the Radioactive Waste Management Complex workers install part of a system that is being used to remove underground organic contaminants.*

DOE has a strong commitment to public involvement. In this plan, these commitments are documented in the Description of Activities, Appendix A, pages 25 through 28.

A direct opportunity for comment on cleanup activities is provided with the publication of proposed cleanup plans. The plans include a comment form that can be mailed or delivered at a meeting and an email address for comments submitted on the Internet.

## IV. Public involvement

### DOE's commitment to involvement

DOE is actively committed to public involvement in all phases of the Superfund process. Besides the legally required public involvement activities, DOE has performed additional activities at the public's request, such as consulting active stakeholders before the proposed plan stage of the CERCLA process, providing tours, and copies of documents days before the public comment periods start.

DOE continues to encourage public participation and comments to make public involvement opportunities even more effective and add value to the cleanup decision. Information and involvement activities are described in Appendix A, pages 25 through 28.

DOE is committed to informing and involving the public in the cleanup decision-making process. This Community Relations Plan documents how CERCLA activities have been modified in response to public comment to improve both information and involvement activities. The public involvement in other cleanup actions controlled by other federal or state statutes will be described in the Idaho Completion Project Public Involvement Plan.

Several public comments on information and involvement activities have resulted in improvement in communication between the agencies and citizens. As activities have been added or modified in response to public comments, positive feedback from citizens has

The screenshot shows the website for the Idaho Completion Project, managed by Bechtel BWXT Idaho, LLC. The site features a navigation bar with links for Home, Agreements, End State, Remediation, Stewardship, and Waste Types. A search bar is located below the navigation. The main content area includes a news headline: "INEEL to eliminate mixed low-level waste backlog in 2004; accelerates cleanup". Other sections include "Accelerating Cleanup of the INEEL", "Environmental Monitoring", and "Get Involved". A sidebar on the left lists various facilities and projects, and a footer provides contact information for Bruce Byram.

*The Idaho Completion Project maintains a website at [cleanup.inel.gov](http://cleanup.inel.gov) to provide information to the public. It contains information about cleanup, updates on several cleanup projects, copies of public documents, and more.*

been received. For example, changes to written materials have increased clarity and reader understanding and provided more related information and answers to common concerns. In response to public concerns, a tracking and referencing system was adopted for use in responsiveness summaries found in records of decision to aid the public in finding responses to their individual comments.

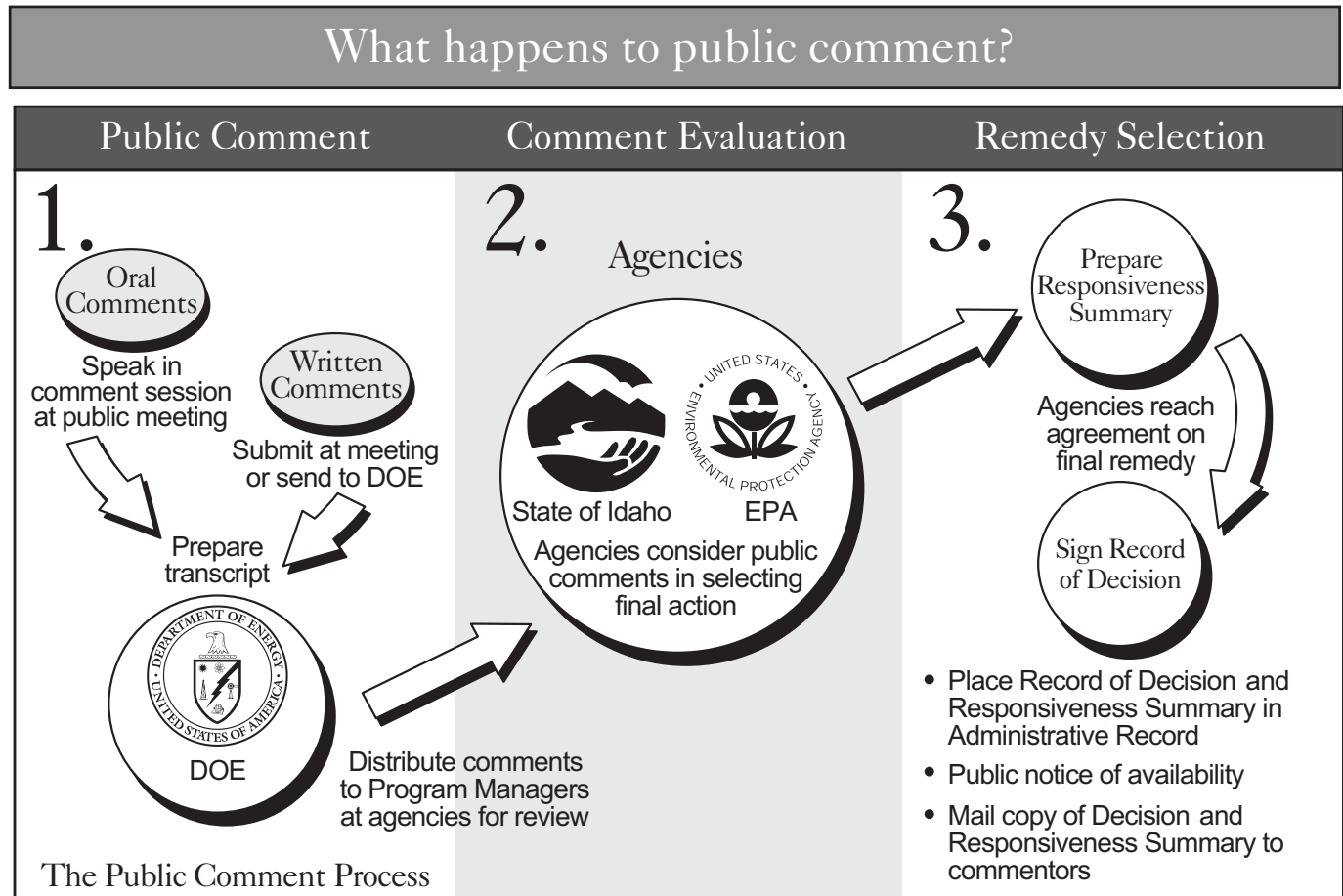
Public meetings have been modified to respond to public concerns. Meeting formats are less formal and presentations less technical. Opportunities for briefings allow the public to interact in person or by phone with agency representatives on specific projects. This allows for the exchange of both questions and comments.

The affected community

DOE defines stakeholders as those individuals, groups, host communities, and other entities in the public and private sectors that are interested in or affected by any of DOE's activities or decisions. The affected community includes citizens directly affected by the INEEL site, other interested citizens or parties, the Shoshone-Bannock Tribes, local and downstream residents, and INEEL employees. Idaho's citizens are affected environmentally and economically by INEEL activities.

The INEEL is one of the state's largest employers and the INEEL's economic benefits are felt statewide, particularly in southeast Idaho. Interest has increased in INEEL projects because of public concern with waste transportation, waste storage and environmental issues.

Finally, members of Idaho's congressional delegation, Idaho's governor, other state officials and members of the state legislature are interested in INEEL programs and environmental activities.





There are three levels of environmental investigations outlined in the action plan of the FFA/CO:

- 1) Potential release sites at the INEEL will be investigated and evaluated in operable units, where remedial action, if necessary, will be taken to eliminate sources of potential releases to the aquifer or to protect worker and public safety.
- 2) The decisions made for each operable unit will be examined during a comprehensive investigation of each waste area group.
- 3) After the comprehensive investigation at each waste area group is complete, there will be a final comprehensive remedial investigation/feasibility study for the miscellaneous sites and the Snake River Plain Aquifer.

### Community profile

Approximately 4,600 people work at the remote INEEL site, while about 2,600 more work at support offices in Idaho Falls. Idaho Falls, located about 30 miles east of the INEEL site, has a population of approximately 50,000 residents and is the largest nearby community. INEEL employees also live in Pocatello, Blackfoot, Rexburg, Arco and other nearby towns. In all, approximately 121,000 people live within a 50-mile radius of the geographic center of the INEEL site, and still more live downstream and are concerned about any issues affecting Idaho's groundwater. Past waste disposal practices at the INEEL have affected portions of the Snake River Plain Aquifer within the INEEL boundary. The aquifer is the primary water source for agriculture, industry and more than 200,000 Idaho residents.

Based on comments received since the early 90s, citizens' concerns and attitudes about the INEEL vary depending on where they live. Many of the citizens and elected officials in the region of Bannock, Bingham, Bonneville, Custer, Jefferson, Butte and Madison counties have been supportive of INEEL activities. Many citizen groups support responsible cleanup and some have called for an end to nuclear reactor testing until the issue of waste disposal is resolved. Others are adamantly opposed to the INEEL being used as a temporary storage site for foreign reactor waste and the nation's commercial reactor waste.

### Levels of public involvement

In the past, various levels of public involvement with INEEL activities have been observed. They vary from television and newspaper coverage, to requests for additional information, to participation in briefings or small group discussions. Rough descriptions are listed below:

#### Aware:

- Keeps up-to-date on events through newspaper, television and radio coverage of INEEL issues
- Requests name be added to mailing list to receive notices concerning upcoming events, public comment periods and specific information releases such as fact sheets

#### Involved:

- Seeks answers to questions raised during review of written materials
- Calls DOE, EPA or the state of Idaho to get information and asks for answers

- Visits one of the regional INEEL Information Repositories
- Asks for personal phone calls when events approach or when questions arise
- Attends some public meetings
- Knows that agencies invite public comment before making a decision

Actively involved:

- Desires broader background information on nature and extent of contamination and health risks and is involved in the agencies' key decision-making process for remedial investigations
- Reviews written materials received and submits written or oral comments
- Requests additional information via briefing or small group discussion
- Attends an open house and public meeting to voice opinions concerning agency proposed plans and talks to project managers
- Volunteers to be on an editorial review committee, reviewing and critiquing documents before they are distributed to the public
- Applies to serve on an advisory board or follows board activities
- Attends most or all DOE-sponsored meetings and briefings

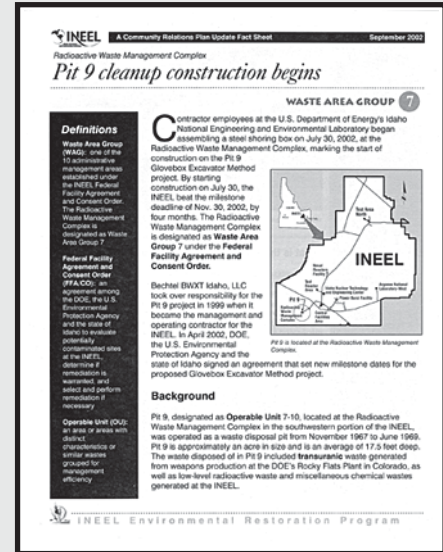
Key concerns and values

Since the early 90s key concerns raised by the public remain largely unchanged. They are:

1. Protection of human health and the environment

Citizens remain concerned about protecting human health and the environment in general, and are particularly concerned about protecting the Snake River Plain Aquifer. Most citizens who expressed this concern said DOE should state in each proposed remediation plan whether a potential release site affects the aquifer and what the risks are to INEEL workers and the public. The public also wants to know how the agencies determine risk. Some stakeholders have recently expressed concern about wastes being left in place once remediation is completed.

*DOE's response:* DOE will include a statement in CERCLA proposed plans stating whether the site under investigation affects the



Fact sheets are periodically released to update stakeholders on the status of cleanup projects and to seek public comment.

Public comments on cleanup projects include the full spectrum—supporting the agencies' proposals, suggesting new alternatives, or complete disagreement. The agencies consider the range of comments in reaching a decision.

### Key Community Concerns

- Protection of human health and the environment
- DOE credibility and commitment to public involvement
- State and EPA involvement
- Effectiveness of public involvement activities
- Effectiveness of communication and written material
- Responsiveness

aquifer. More emphasis will be placed on explaining the risk this waste may pose to INEEL workers and the public, the risk posed by a cleanup action and the risk of leaving the residual waste in place. Procedures and assumptions for determining risk are outlined in EPA guidance and are often discussed in public meetings, briefings and workshops

### 2. DOE credibility and commitment to public involvement

A common request by citizens was to be involved earlier in the decision-making process. Members of environmental groups and a civic organization called for the creation of an independent panel to advise DOE on cleanup decisions and issues. Those who supported such a proposal said the panel could enhance the public's comprehension of the cleanup program and involvement in the decision-making process.

*DOE's response:* DOE responded to citizens' comments, forming the INEEL Citizens Advisory Board, a nonpartisan, broadly representative organization. Fifteen individuals from around the state with diverse backgrounds and interests provide advice to the DOE on environmental restoration, waste management and other INEEL issues. One board member represents the Shoshone-Bannock Tribes. Other members are chosen to represent nine key perspec-



*A radiation control technician checks a tank removed from the ground at the Test Reactor Area for any remaining contamination.*

tives: natural resource users, site-related union/workforce, educational community, affected local governments, health professionals, environmental interests, business interests, and the general public. The board develops its own agenda and requests briefings on topics of its choosing. For information about upcoming meetings, check the Citizens Advisory Board web site at <http://www.ida.net/users/cab>. The phone number for the Citizens Advisory Board is listed in Appendix C on page 30.

Earlier public involvement is also achieved by distributing fact sheets to the public. Fact sheets inform citizens about agency discussions and planning assumptions before decisions are made. The public is then able to provide input on a postage-paid comment form during scoping to help the agencies define the work for remedial projects.

### 3. State and EPA involvement

Some citizens have commented that the state and EPA should be more active in their environmental restoration role. Participants generally regard information from the state and EPA as more reliable than information provided by DOE, and they believe the state is more motivated than federal agencies to protect the environment.

*DOE's response:* The EPA, the state of Idaho and DOE are partners in the FFA/CO and in all decisions. The visibility of their roles has been emphasized through such practices as including EPA and state comments on documents in the Administrative Record. State and EPA representatives are active participants in meetings, briefings, and workshops, either in person or by teleconference phone calls. Both the state and EPA may also hold meetings and briefings on the remediation program.

The INEEL Oversight Program, an independent state entity, distributes a quarterly newsletter called the *Oversight Monitor*. The state also provides access to INEEL information using a toll-free phone line, (800) 232-INEEL or on the internet at [www.oversight.state.id.us](http://www.oversight.state.id.us).

### 4. Effectiveness of public involvement activities

Many workshop respondents have said that DOE needs to get more information to the public in an effort to involve more people. A variety of media have been suggested.

*DOE's response:* Comments received during small group discussions, open houses, meetings, and workshops form the basis of the community relations activities outlined in this plan. Public participation activities are developed and modified to present different

## INEEL Oversight Program

The state's INEEL Oversight Program was established by the Idaho legislature in 1990. The program fills an independent oversight role of identifying areas of concern, investigating root causes and recommending actions to improve operations and practices at INEEL. Oversight program staff may choose to take split samples from monitoring wells with DOE or initiate sampling activities on their own to verify results of environmental monitoring.

This program continually monitors water quality of the Snake River Plain Aquifer. For current monitoring information, call (800) 232-INEEL.







activities and solicit public input to better suit public interest.

The goal of the Community Relations Program is to tailor information and activities to the needs of the public. Appendix A of this plan describes the many ways that DOE provides information to citizens. Citizens can choose the informational sources, opportunities and activities that best fit their level of interest.

#### 5. Effectiveness of communications and written material

The public cited a need to improve written and oral communications with the public. Citizens said they want to see more discussion in proposed plans and fact sheets on risk, remediation alternatives, and final disposal of wastes. Some citizens said they would like DOE to discuss in written form how proposed cleanup actions would benefit them.

*DOE's response:* Comments received from the public concerning communications, meeting format or written materials (such as proposed plans) are considered early in the development stage. Many of the comments concerning written materials have been incorporated into documents prepared for the public.

#### 6. Responsiveness

Some respondents said DOE needs to do a better job in responsiveness summaries by indicating whether a comment affected the cleanup decision. In addition, citizens have asked that they be given credit when their ideas are used by the agencies.

*DOE's response:* Public comments are considered by agency representatives prior to finalizing their selection of a remedial action (see chart, "What Happens to Public Comment?" on page 19.) The agencies try not to over-generalize comments so the intent of the comment remains intact. The agencies recognize the importance of each comment and strive to explain the effect they have on cleanup decisions. Comments have contributed to further investigation at a site, incorporating waste treatment suggestions in decision documents and promoting clarification of complex cleanup projects.

## V. Appendices

### Appendix A

#### Description of activities

The following paragraphs outline information and involvement activities available to citizens who choose to participate in a way that best fits their level of interest.

#### Information activities


*Administrative Record/INEEL Information Repositories.* The Administrative Record is the collection of documents required by the Superfund law, which is used by the three agencies to select a response action. The purpose of the Administrative Record is to provide a legal basis for CERCLA remedies. The Administrative Record also provides information for public participation on remediation projects. All correspondence signed by agency project managers is included in the Administrative Record. Online versions of Administrative Record documents can be found at **<http://ar.inel.gov/>**.

Information repositories contain background information and current studies involving the INEEL, general remediation activities, technical studies, and other information that may be of interest to the public (such as press releases, fact sheets and information on public technical assistance grants).

The official Administrative Record file is maintained at the INEEL Technical Library in Idaho Falls. Documents in the INEEL Technical Library can be accessed by members of the public in the Public Reading Room at the Tingey Administration Building (formerly University Place) from 8 a.m.-5 p.m. Monday through Thursday and on alternating Fridays. More information about the INEEL Technical Library is available by phone at (208) 526-1185 or online at **<http://www.inel.gov/library/>**.

In recent years, the increasing number of volumes in this collection has resulted in problems with space allocation at some former repositories. To reduce space requirements while providing public access to the collections, information will be available at some locations but will also be available through the Internet. Based on comments by citizens who use the collections and input from librarians, several changes have been made. Administrative Record and Information Repository documents are available at the INEEL Technical Library in Idaho Falls and the Albertsons Library at Boise State University (see Appendix C, page 30, of this document for





their locations.) Interested citizens can request a document listed in the index by calling (800) 708-2680.

*Fact Sheets.* Fact sheets describe aspects of the cleanup program including descriptions of waste area groups, remediation projects, or cleanup technology. Fact sheets are considered supplements to the Community Relations Plan and are part of the remedial investigation/feasibility study process. They are specific to each major project. Fact sheets are also used as a method to inform the public on agency discussions about scoping for projects and alternative selection. Fact sheets may provide the public with further detail during the investigation, decision, design and remedial action phases of a cleanup project and can provide the public with an opportunity for public input to the agencies through the return of post-age-paid comment forms to DOE. Copies of these comment forms are transmitted to the state and EPA so the agencies are aware of public concern.

*Postcards.* Postcards are sent to citizens on the mailing list to notify them of new documents that are available, public comment periods, extensions to public comment periods, and other public participation activities.

*News Releases.* News releases announcing public meetings, public comment periods and current developments of cleanup projects are sent to newspapers and radio stations statewide, government agencies such as the governor's office and state offices.

*Public Notices.* Advertisements published in major newspapers and broadcasts via radio stations announce public participation activities such as meetings, briefings, or public comment periods on specific cleanup projects. Public notices also announce agency decisions, major project milestones and the availability of important documents.

*Proposed Plans.* A proposed plan is a document distributed to the public that explains the investigation of an operable unit, assesses potential health effects, presents alternatives for cleanup action and solicits public comment on a preferred cleanup alternative (the agencies are required by law to designate a preferred alternative). The plan also explains the reasoning that supports a preferred alternative. A risk assessment, using guidance from EPA, is included in the plan to inform the public of potential health or environmental risks to workers, the public or the surrounding area. A 30-day public comment period on the proposed plan is announced through mailings, media channels and personal phone calls to interested citizens. DOE provides opportunities for public meetings in the major geographic regions of the state during the 30-day comment period. The public may request an extension to the comment period.

*Records of Decision.* A record of decision is a document prepared by the agencies that specifies the selected remedy for a given remedial project. This decision is made after several factors, including public comments, are considered. Part of the record of decision is a responsiveness summary, which is a summary of the written and oral comments made by the public on the specific cleanup project and agency responses to those comments. If there are any significant changes, or if the selected cleanup remedy is different from the alternatives listed in the proposed plan, an explanation of significant differences is provided. The record of decision also states cleanup goals for the project, which are further refined in the remedial design phase.

*Exhibits.* Visual displays such as maps, charts, diagrams, or photographs may be used in an exhibit on an individual cleanup project or on any topic related to the cleanup program. Exhibits requested by the



public have been set up in public locations from time to time.

*Spokesperson.* A representative of the INEEL has been designated as a key contact person for media interviews. The spokesperson for the Superfund cleanup program at the INEEL can be reached at (800) 708-2680 or (208) 526-3183.

### Involvement activities

*Citizens Advisory Board meetings.* Members of the public can attend board meetings, listen to agency briefings, and comment on any topics of concern. Public comments are included in the CAB meeting minutes. For more information on this advisory board, please call (208) 557-7832 or visit the CAB website at <http://www.ida.net/users/cab>.

*Early Involvement and Scoping.* In response to the public's request for earlier involvement, two mechanisms are in place. Some fact sheets are distributed to the public to update citizens as agency discussions and planning begin for proposed projects. Citizens then have the opportunity to provide input to the agencies, through postage-paid comment forms, for consideration during the scoping phase of project planning. Another mechanism in place to accommodate earlier involvement is the advisory board, which is to be involved in planning and public participation issues.

*Workshops.* Workshops are held to discuss topics in an informal atmosphere. Formats may include several focus groups to allow more individuals to actively participate in smaller groups. Emphasis may be given to different topics in each group allowing citizens to ask questions about specific areas of interest. This format also allows the opportunity for written and oral comment by the public.

*Public Comment Opportunities.* Public comment periods are designated to allow

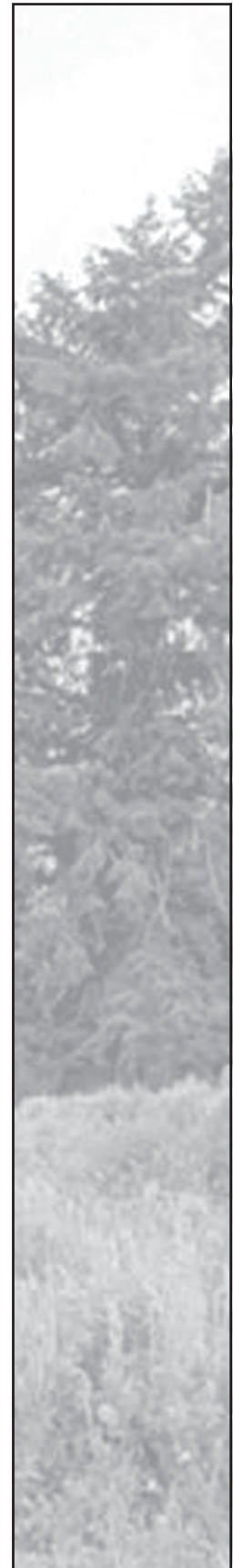
public review and comment, either written or oral, on proposed cleanup plans. Notification of comment periods is given through the news media, mailings and phone calls. A public meeting or workshop where comments are gathered from the public is often held in the middle of the public comment period. Comment periods are generally 30 days and may be extended upon request.

*Public Meetings.* Public meetings are held both to inform the public on cleanup projects and to receive oral or written comments from the public. The format for public meetings usually includes an informal open house before a presentation concerning a cleanup project, a question-and-answer session and an oral comment session for citizens. If two or three different cleanup projects are discussed, a formal comment session is held for each project. DOE has provided alternatives to evening meetings, which may include briefings with displays in malls or "brown bag" lunches with short presentations in downtown locations.

*Open Houses.* Open houses are often held in the same location as, and just prior to, a public meeting. They may be held in any number of locations where citizens desire an informal opportunity for one-on-one discussions about general or specific topics.

*Small Group Meetings.* Small groups may request meetings with agency staff. These meetings give agency staff a first-hand opportunity to gain information from interested citizens and state and local officials.

*Briefings.* Briefings may be requested by individuals and groups so they may gain information and give public input to agency representatives concerning cleanup projects. Topics for briefings may include discussions of current cleanup projects or the status of the overall cleanup program.







During these briefings, agency representatives from DOE, EPA and the state of Idaho are often present in person or on a teleconference call for interaction with the public. Briefings are informal and, where possible, will be held in association with other DOE meetings and activities.

*Idaho Completion Project Community Relations Office.* The ICP Community Relations office, located in Idaho Falls, can provide information and briefings on CERCLA cleanup topics. The Community Relations Plan coordinator is also available at this location and can provide information on all public participation activities. The Community Relations Plan coordinator can be reached at (800) 708-2680, (208) 526-3183, or [campjl@inel.gov](mailto:campjl@inel.gov).

*Telephone Contacts.* Telephone calls are made to interested citizens and state and local officials concerning upcoming events, public comment periods, meetings, workshops, briefings and other public participation opportunities. The telephone contact list is expanded through activities such as briefings and meetings with citizens who express interest in advance notification and involvement in activities.

*Community Interviews.* Informal one-on-one interviews with local citizens, government officials, Indian tribes, community groups, media representatives and other individuals may be held to solicit public input on issues related to cleanup. These interviews can be over the phone or in person.

*Presentations.* Formal and informal presentations are given to civic groups, school classes and interested audiences on requested topics concerning cleanup. These presentations and interactions allow agency representatives to gain insight into public perception of the project.

*Site Tours.* Tours of the entire INEEL site or a specific site can be requested at other times by interested citizens, media representatives, and state and local officials. Public Affairs and technical staff are available during the tours to answer any questions.

*News Conferences.* Information sessions or briefings are held for news media to ensure understanding of cleanup projects and to answer questions. These news conferences are also open to the public.

## Appendix B

### Technical assistance grants

In 1986, the EPA established the Technical Assistance Grant Program to help citizen groups hire a technical advisor to interpret and explain Superfund remedial actions and information. Application requirements were revised in 1992, which may allow more groups to be eligible for the grant.

A grant of up to \$50,000 can be obtained. The grant may last for the life of the Superfund project. According to program guidelines, a matching share of 20 percent is required from the applicant. The matching share can be in the form of cash or in-kind services provided by members of an organization.

Groups eligible to receive a Technical Assistance Grant are those with members that may be affected by a confirmed release or threatened release of toxic wastes from a facility listed on the National Priorities List. A group applying for a Technical Assistance Grant must be nonprofit and incorporated, or working toward incorporation, under applicable state laws.

Grant funds can be used to hire a technical advisor to help the group understand existing site information or developments during the Superfund cleanup process. Information may include, but is not limited to, analytical profiles or conditions at the site, the nature of wastes involved, and types of technology available to clean up the site.

The *Superfund Technical Assistance Grant Handbook* provides more detailed information on the Technical Assistance Grant Program. The current handbook is available to the public in the INEEL Information Repositories (see Appendix C, page 30, for their locations.)

### **Technical Assistance Grants**

Information and grant applications are available from the EPA. Contact Marianne Deppman, Technical Assistance Grant Regional Coordinator, EPA Region 10, ECO-081, 1200 Sixth Avenue, Seattle, WA 98101 (206) 553-6919.

## Appendix C

### List of contacts

#### U.S. Department of Energy Idaho Operations Office

P.O. Box 1625  
Idaho Falls, ID 83415-3911  
(800) 708-2680.

Kathleen E. Hain, Lead  
DOE Environmental Restoration Program  
(208) 526-4392  
hainke@inel.gov

Wendy Dixon, Environmental Restoration  
DOE Naval Reactors Facility  
(208) 533-5294  
dixonwr@bettis.gov

Greg Bass, Environmental Engineer  
DOE Argonne Area Office-West  
(208) 533-7184  
greg.bass@anlw.anl.gov

#### Community Relations Plan

Joseph Campbell  
Community Relations Plan Coordinator  
(208) 526-3183  
campjl@inel.gov

#### INEEL Citizens Advisory Board

<http://www.ida.net/users/cab>  
c/o North Wind, Incorporated  
P.O. Box 51174  
Idaho Falls, ID 83405  
(208) 557-7832

#### Idaho Department of Environmental Quality

<http://www.deq.state.id.us/>

Daryl Koch, Acting Project Manager  
INEEL Cleanup Project  
Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706  
(208) 373-0285  
dkoch@deq.state.id.us

#### INEEL Oversight Program

<http://www.oversight.state.id.us/>  
Jaime Fuhrman, Public Information Officer  
1410 N. Hilton  
Boise, ID 83706  
(208) 373-0519  
jfuhrman@deq.state.id.us

#### U.S. Environmental Protection Agency

<http://www.epa.gov/region10/>

Nicholas Ceto, Project Manager  
INEEL Cleanup Project  
U.S. EPA Region 10  
712 Swift Blvd.; Suite 5  
Richland, WA 99352  
(509) 376-9529  
ceto.nicholas@epa.gov

Kathleen Veit, Unit Manager  
Community Relations and Outreach Unit  
PA Region 10, ECO-081  
1200 Sixth Avenue  
Seattle, WA 98101  
(206) 553-1352  
veit.kathleen@epa.gov

Marianne Deppman  
Technical Assistance Grant Regional Coordinator  
EPA Region 10, ECO-081  
1200 Sixth Avenue  
Seattle, WA 98101  
(206) 553-6919  
deppman.marianne@epa.gov

#### INEEL Information Repositories

##### The INEEL Administrative Record

<http://ar.inel.gov>

##### INEEL Technical Library

<http://www.inel.gov/library>

1776 Science Center Drive  
Idaho Falls, ID 83415  
(208) 526-1185

##### Public Reading Room Hours

Hours: 8:00 a.m. – 5:00 p.m.  
Monday – Thursday  
8:00 a.m. – 5 p.m.  
Every other Friday

##### Albertsons Library

<http://library.boisestate.edu/>

Boise State University  
1910 University Drive  
Boise, ID 83725  
208-426-1625

Hours: 7:30 a.m. – 11 p.m.  
Monday – Thursday  
7:30 a.m. – 6 p.m. Friday  
10 a.m. – 6 p.m. Saturday  
10 a.m. – 11 p.m. Sunday



GA02-51126-01