

Understanding Hanford Regulatory Public Involvement



This document introduces the different types of public involvement opportunities at Hanford that are required by various state and federal regulations. Other ways to interact with the agencies include feedback periods, informational sessions, education and outreach events, and public surveys.



U.S. Department of Energy (Energy) - Permittee - responsible for the cleanup of the Hanford Site.

Washington State Dept. of Ecology (Ecology) - Regulator - responsible for overseeing the cleanup and making sure it complies with state and federal regulations - Federal authority given by EPA - primarily RCRA.

U.S. Environmental Protection Agency (EPA) - Regulator - responsible for overseeing the cleanup and making sure it complies with federal regulations - primarily CERCLA.



RCRA - *Resource Conservation and Recovery Act* - Entails "cradle to grave," meaning the generation, management, disposal, and potential cleanup of hazardous waste. Thus, RCRA focuses on preventing environmental releases or cleaning up releases if they occur.

CERCLA - *Comprehensive Environmental Response, Compensation and Liability Act* - Also referred to as "Superfund," authorizes two types of response actions – short-term removals and long-term remedial response actions.

TPA - *Tri-Party Agreement* - Signed by Energy, Ecology, and the EPA on May 15, 1989, is the governing document and roadmap for Hanford, setting cleanup milestones. The TPA ensures compliance with federal and state laws during the cleanup of mixed hazardous and radioactive nuclear waste.

WIR - *Waste Incidental to Reprocessing Evaluation* - Determines if waste that has been pretreated to remove as much radioactivity as feasible meets Nuclear Regulatory Commission criteria for treatment and disposal as low-level waste.



Hazardous Waste - Non-radioactive waste that is dangerous or potentially harmful to human health or the environment. Hazardous wastes can be liquids, solids, gases, or sludges.

Mixed Hazardous and Radioactive Waste - Hazardous waste combined with radioactive constituents.

Engineering Evaluation/Cost Analysis (EE/CA) - Summarizes cleanup alternatives for waste sites under a "non-time critical" removal action and recommends one of the alternatives.

Regulation	RCRA	CERCLA	TPA	WIR
Who is the lead regulatory agency?	Ecology	EPA	The three agencies	Energy
What are the public involvement opportunities?	Hanford permit actions	Proposed Plans on remedial actions and EE/CAs for removal actions	"Significant" changes to the TPA require public comment periods	Comment period and public meeting(s)
How long are the comment periods? (can be extended upon request)	• 45 day (Agency-initiated) • 60 days (class 2)* • 60 days + 45 days (class 3 which has two comment periods)**	30 days	45 days	Not required. If held, typically 90 -120 days
Is a public meeting required?	Yes	No (can be requested)	No (can be requested)	No (a meeting is typically held)
Do agencies issue a formal response to comments document?	Yes	Yes	Yes	Yes

*A class 2 modification is for changes which are more significant than typographical errors or name changes. They require Energy to hold a 60-day comment period on the proposal. Ecology can use feedback from this comment period to help shape the permit changes.

** A class 3 is for changes which are the most significant. They require Energy to hold a 60-day comment period on the proposal. Then, Ecology holds a 45-day comment period on the proposal. Ecology can use feedback from both comment periods to help shape the permit changes.