



June 2, 2000

Ms. Carolyn Huntoon, Assistant Secretary  
Office of Environmental Management  
U.S. Department of Energy  
1000 Independence Ave. S.W.  
Washington, DC 20585

Subject: Transfer of Authority for Records of Decision Back to Headquarters

Dear Ms. Huntoon:

We are writing to express our concerns over your Memorandum dated May 2, 2000, changing the delegation of approval authority for Environmental Restoration documents. Your memo removed signature authority for Interim CERCLA Records of Decision and RCRA permits from the site managers and transferred those authorities to DOE-Headquarters. The Hanford Advisory Board requests reversal of this decision.

We are concerned this change will add an additional layer to an already complex process for review and approval of environmental documents. We are also concerned that moving signature authority from the site to Headquarters will reduce accountability and impede public participation. When then-Assistant Secretary Tom Grumbly assigned authority to the field offices for authority and approvals, he stated "the technical expertise to implement the [Environmental Restoration] program resides primarily with the Operations Offices." In addition, some Headquarters experts were deployed to the field offices. Is Headquarters now staffed with the appropriate experts to review and approve these documents in a timely fashion?

We request clarification of your intent and guidance to the Headquarters staff members. Will Headquarters supplant the site managers or will they aid them in some manner? If so, how? What will be the role of the Hanford Advisory Board in this process? How will Headquarters have substantive dialogue with the Board and regional stakeholders? Who will actually sign the Interim CERCLA Records of Decision for the DOE?

We are alarmed that this change will delay critical decisions and hamper cleanup, thereby compromising binding Tri-Party Agreement milestones and undermining the Tri-Party Agreement process.

Until you rescind this decision, we expect that appropriate Headquarters staff will attend and participate in the meetings of the Hanford Advisory Board. This will afford Board members and other regional stakeholders the opportunity to express our interests and concerns and will provide the Headquarters staff the opportunity to be better informed in their decision-making.

We look forward to your response and to periodic progress updates on this matter.

Very truly yours,

/s/Merilyn B. Reeves, Chair  
Hanford Advisory Board

cc: Keith Klein, U.S. Department of Energy, Richland Operations  
Chuck Clarke, U.S. Environmental Protection Agency, Region 10  
Tom Fitzsimmons, Washington Department of Ecology  
Dick French, Office of River Protection  
Wade Ballard, Deputy Designated Federal Official  
The Oregon and Washington Congressional Delegations  
Michael Gearheard, Environmental Protection Agency  
Dan Silver, Washington Department of Ecology  
David Bodde, Environmental Management Advisory Board Co-Chair  
Joel Bennett, Environmental Management Advisory Board Co-Chair  
Site Specific Advisory Board Chairs

---

*This advice represents HAB consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.*

---

[Hanford Home Page](#) | [HAB](#) | [Advice Index](#)

*For questions or comments, please send [email](mailto:Hanford_Advisory_Board@rl.gov) to Hanford\_Advisory\_Board@rl.gov*  
*HAB Consensus Advice #110*  
*Subject: Transfer of Authority for Records of Decision Back to Headquarters*