



Advice # 110 From: Carolyn L. Huntoon

Ms. Marilyn B. Reeves
Chair, Hanford Advisory Board
723 Parkway; Suite 2000
Richland, WA 99352

Dear Ms. Reeves:

Thank you for your letter dated June 2, 2000, expressing concerns of the Hanford Advisory Board with my memorandum dated May 2, 2000, regarding the delegation of approval authority for environmental restoration decision documents. As always, I appreciate your Board's advice on issues affecting the environmental cleanup at Hanford.

I would like to clarify the existing roles and responsibilities of the Field Office and Headquarters for environmental restoration documents. First, the Field continues to have negotiation and signature authority for all environmental restoration decisions. Secondly, Headquarters approval continues to be required for RCRA draft permits and permit modifications (i.e., for major Corrective Actions). Thirdly, Headquarters approval continues to be required for final CERCLA Proposed Plans and Records of Decision and is now also required for interim proposed plans and Records of Decision.

The only substantive change in roles and responsibilities effected by my May 2, 2000, memorandum is to eliminate any differences in how we handle interim and final CERCLA Proposed Plans and Records of Decision (RODS). In my opinion there is no justifiable reason to distinguish between the interim and final decisions since significant issues and substantive resource commitments can exist with either type of decision. I believe that Headquarters approval of pending environmental restoration decisions ensures that all alternatives have been adequately evaluated; that decisions are technically sound and can be accomplished within anticipated future budgets; and that the complex-wide impacts and national policy implications of proposed decisions are considered and accepted.

I appreciate your concern that Headquarters's involvement could potentially delay decisions and thus hamper cleanup. It is my intent to prevent any unnecessary delays. The internal remedy review process we use to provide Headquarters managers with an independent technical assessment of proposed actions, is initiated at the draft Proposed Plan phase and generally completed within two weeks. Furthermore, these reviews have often resulted in technical recommendations to improve the decision and streamline implementation. Of the 13 proposed environmental restoration decisions reviewed last year by Headquarters, only one proposed decision required extended discussions. Finally, please be assured that the role of the Hanford Advisory Board (HAB) is in no way affected by my May 2 memorandum. The hard work and considered advice and recommendations of the HAB are of great value both to Headquarters and the site. Any recommendations of the HAB on pending environmental restoration decisions will continue to be considered by both the site and Headquarters.

Should you have further questions regarding approval authority for environmental restoration documents at Hanford, please contact David G. Huizenga, Deputy Assistant Secretary for the Office of Integration

and Disposition at 202-586-5151. Again, thank you for the Board's continuing commitment to the cleanup of the Hanford site.

Sincerely,

Carolyn L. Huntoon
Assistant Secretary for
Environmental Management

cc: Keith Klein, DOE-RL
Leif Erickson, DOE-River Protection
Wade Ballard, DOE-RL
Chuck Clarke, EPA-Region X
Michael Gearheard, EPA
Tom Fitzsimmons, Washington Department of Ecology
Dan Silver, Washington Department of Ecology
David Bodde, EMAB
Joel Bennett, EMAB
Site Specific Advisory Board Chairs

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For questions or comments, please send [email](mailto:Hanford_Advisory_Board@rl.gov) to Hanford_Advisory_Board@rl.gov

Response to HAB Advice #110 (June 2, 2000)

Subject: HAB Consensus Advice on Transfer of Authority for Records of Decision Back to HQ

Letter from Carolyn Huntoon, dated August 2, 2000

URL: <http://www.hanford.gov/boards/hab/response/110.htm>

Last Updated: 02/20/2001 15:14:28