

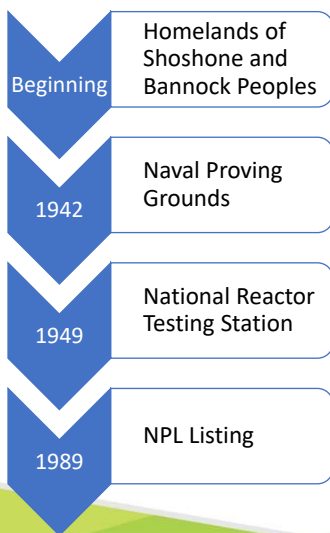
# Tribal Engagement at Idaho National Laboratory: Lessons Learned for RPMs

Federal Facilities Online Academy  
Coordinating with Tribes at Federal Facilities  
December 12, 2024

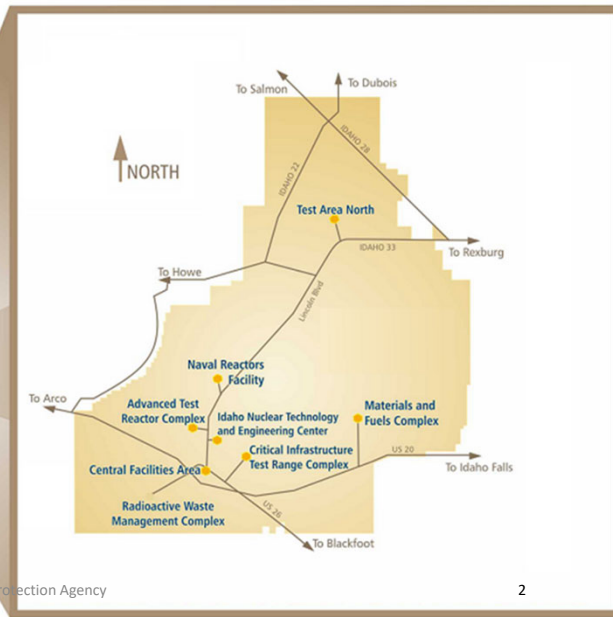
Benjamin Leake – RPM, Region 10

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## Idaho National Laboratory



**IDAHO**



U.S. Environmental Protection Agency

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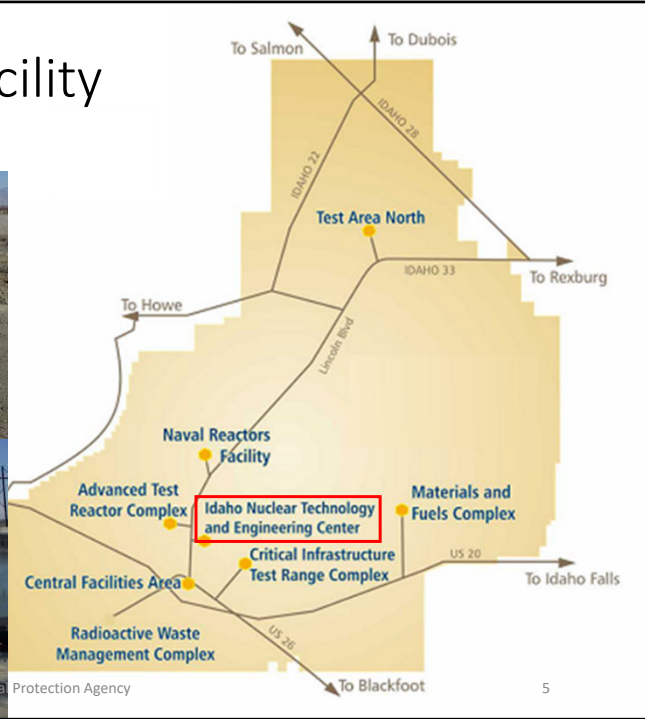
## CERCLA at INL

- Remedial Action Since 1993
- 10 Waste Area Groups
- 100+ Operable Units
- Community Advisory Board
- Tribal Engagement



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# Idaho CERCLA Disposal Facility



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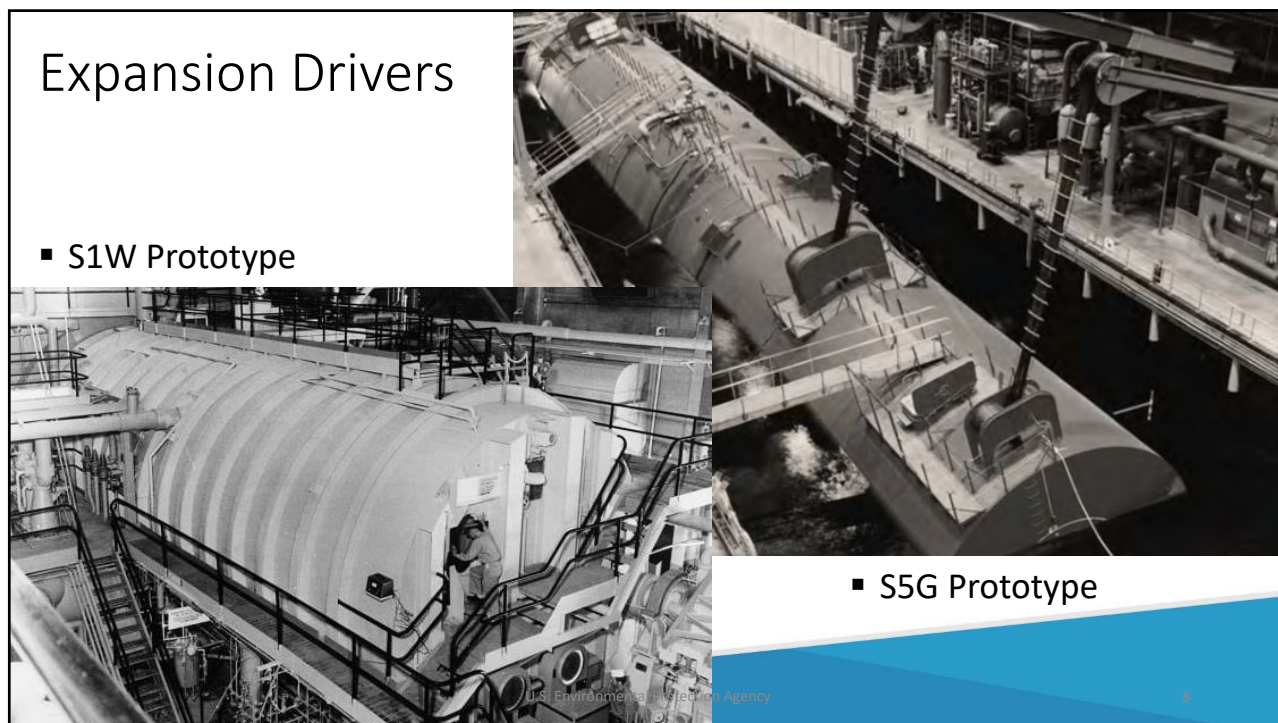
## Idaho CERCLA Disposal Facility

- ROD Signed in 1999
- RCRA Subtitle C / TSCA Chemical Waste Landfill
- 510,000 yd<sup>3</sup> Capacity
- Waste Disposal Began in 2003
- On-site CERCLA Waste Only
- Mixed & Low-Level Wastes, Soils & Debris, Large Items

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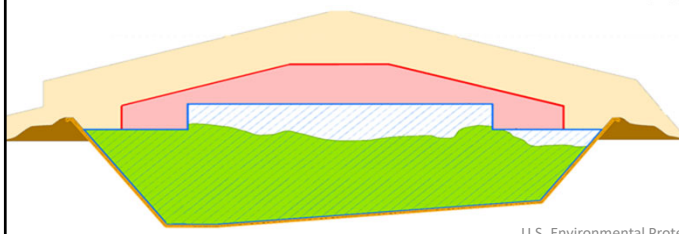
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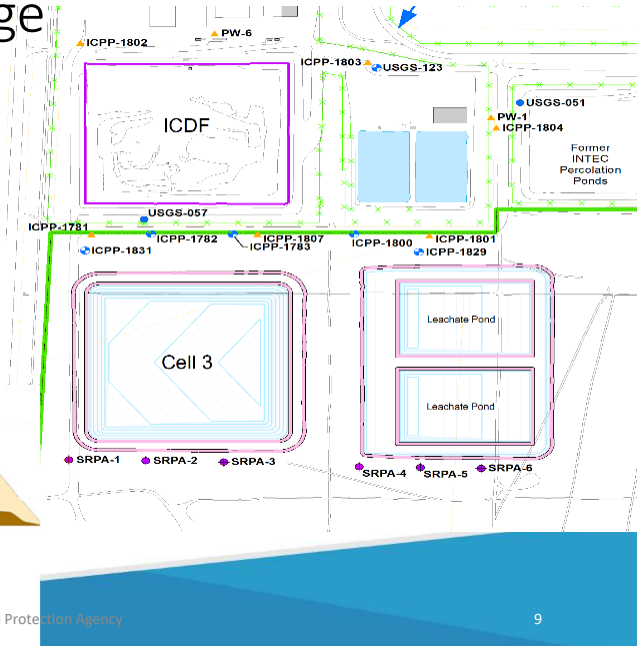
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# Record of Decision Change

- Explanation of Significant Differences
- Signed 11/1/2022
- Increased Disposal Capacity
  - Optimized Waste Placement
  - Construction of New Cell and Evaporation Ponds
  - Six new groundwater monitoring wells



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ICDF Landfill Waste Placement Utilization Profile



# Engagement Authorities

## Tribal Engagement

- CERCLA
- National Contingency Plan
- Executive Orders
- Agency Policies

## Public Engagement

- CERCLA
- National Contingency Plan
- Agency Policies

## Tribal Coordination and Consultation

### Tribal Coordination

- Sharing information, education, and outreach.
- Most often at staff level.
- Can be part of Consultation.
- Cannot substitute for Consultation.
- Often consists of regular meetings.



### Tribal Consultation

- Process of meaningful communication and coordination between agency and Tribal officials.
- Taken *prior* to agency actions or implementing decisions that may affect Tribes.

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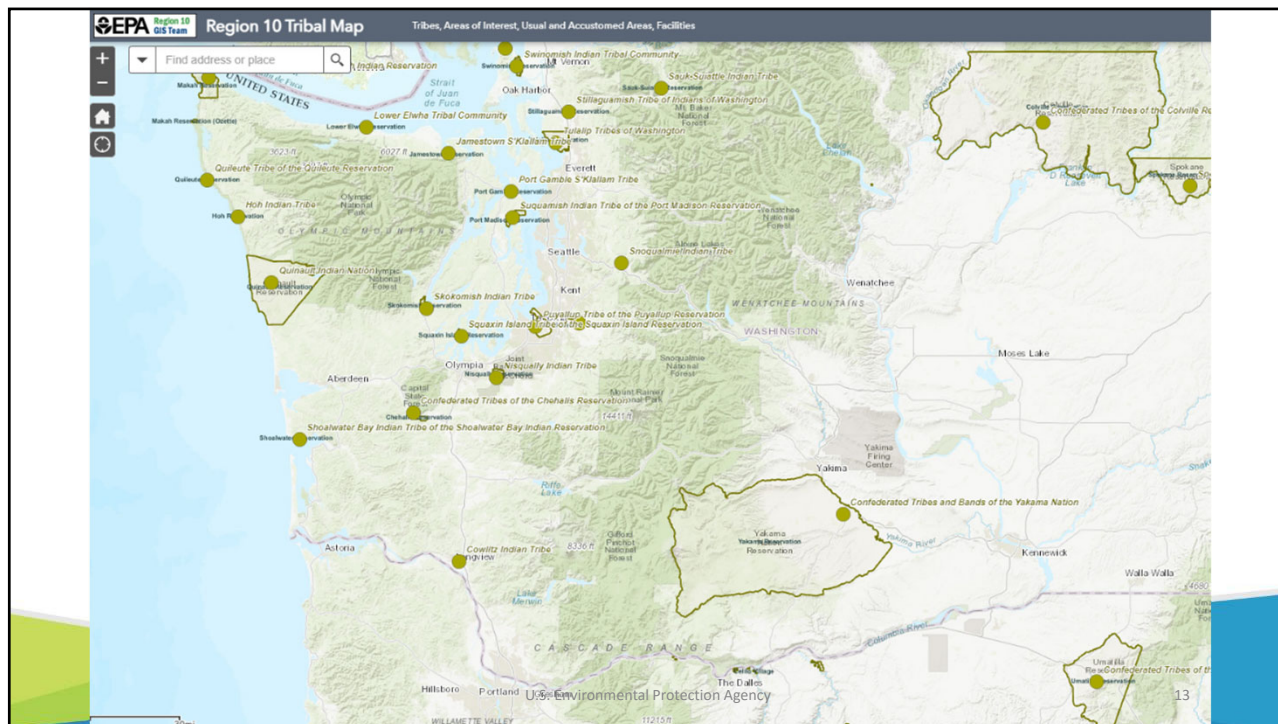
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## Preparing to Engage

- Establish Need
- Craft a Plan
- Build Consensus
- Start the Work



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## Steps to Consult

- ✓ Review & Revise Document
- ✓ Brief Management
- ✓ Send Offer Letter
- ✓ Send Post-Offer Letter
- ✓ Send Document/Briefing
- ✓ Schedule Consultation
- ✓ Technical Pre-Brief
- ✓ Internal Pre-Consult Meeting
- ✓ **Consultation**



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## Consultation Experience



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## Positive Impacts of Engagement

- Improved Relationships
- Increased Agency and Tribal Collaboration
- Additional Consultations
- More Robust Cleanups
- Long-term Stewardship



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## Lessons Learned

- Start building relationships now
- Use available resources
- Schedule for engagement
- Know your project
- Briefing papers are key
- Be open to change



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## ICDF Cell 3 Remedial Action



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# Questions?

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