

**THE CONTENTS OF THIS DOCUMENT
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INITIAL DP DATE 1/26/00

Appendix A

Responsiveness Summary Comments

Appendix A

Comment Documents and Responses

This appendix accompanies the Responsiveness Summary, Part III of the Record of Decision (ROD) for Operable Unit 1-10 of Waste Area Group (WAG) 1, Test Area North (TAN), at the Idaho National Engineering and Environmental Laboratory (INEEL). It contains the scanned images of all written comments received before the close of the comment periods, on both the original February and revised November proposed plans, and transcripts of oral comments made during the formal comment session of each public meeting.

The scanned images are annotated with sidebars indicating the identified comments, using a three-part alphanumeric code to designate the document number, comment number within it, and response or responses in the Responsiveness Summary relevant to this comment. Each document number begins with an F, N, or T, identifying it as a written comment received following the February proposed plan (F), a written comment received following the November proposed plan (N), or an oral comment made during the formal comment period of a public meeting (T). All public meetings held were concerning the February proposed plan. The number following the letter F, N, or T was assigned to each separately received document according to the order in which it was received. The second number, following the hyphen, identifies comments identified within each document. Following the slash, the final number or numbers denote the response within the Responsiveness Summary that addresses the comment.

Adjacent to the scanned comments are the Agency responses to them. Most responses are presented on the same page as the comment they address. In cases where many comments were identified on a single page, the responses may continue onto following pages. Responses to comments that are identical or very similar in nature are repeated throughout the document. Comments that were grouped under the same issue code for the Responsiveness Summary may not have identical responses, however, depending on which portion of the response is germane to a particular comment.

This Responsiveness Summary identified and responded to more than 250 statements of preferences and concerns, comments, and questions received in more than 60 pages of written comments from at least 20 individuals and interested groups, and as formal statements at three public meetings. The following indexes summarize the numbers of comments received on the various issues of concern defined in the Responsiveness Summary, and list the individuals and groups who submitted comments in writing or presented them orally at a public meeting.

Index of Public Comments and Responses by Issue of Concern

Comment Category ^a	Issue	Response Numbers ^a	Documents Containing Comments on Issue	Number of Commenters ^b on Issue	Number of Comments on Issue
2.1.1	Overall Goals and Structure of the INEEL Environmental Restoration Program	1-6	F02, F04, F06, F07, F10, N01, N03, N05, N07, T01, T03	8	16
2.1.2	Public Participation and Community Relations	7-9	F02, F03, F04, F06, F07, F12, N03, N04, N05, N07, T02	8	13
2.1.3	Content and Organization of the Proposed Plan	10-12	F07, F09, F10, F12, N01, N03, N04, N05, N06, N07,	7	22
2.1.4	Current and Future Activities at TAN	13	F07, N01	1	2
2.1.5	WAG 1 Remediation Planning and Costs	14-18	F05, F06, F10, N02, N03, N04, N07,	6	11
2.2.1	The Comprehensive RI/FS (including General Comments, Inclusion of Sites, and Classification of Contaminants)	19-24	F05, F07, F10, N01, N03, T03	3	21
2.2.2	Risk Assessment	25-29	F01, F02, F06, F07, F10, N01, N04, N06, N07	8	12
2.2.3	Remedial Action Objectives and Compliance with ARARs	30-33	F06, F07, F10, N01	3	11
2.2.4	Development of Alternatives	34-37	F02, F06, F07, F09, F10, F12, N01, N03, N05	7	15
2.2.5	Implementation of Alternatives (including Environmental Monitoring and Institutional Controls)	38-41	F03, F05, F10, N03, N06	4	6
2.2.6	Evaluation of Alternatives	42-46	F05, F06, F08, N05	4	8
2.3.1	V-Tanks (TSF-09 and TSF-18) Site Description and Alternatives	47-54	F06, F07, F09, F12, N01, N02, N03, N05, N06, T01	9	45
2.3.2	PM-2A Tanks (TSF-26) Site Description and Alternatives	55-58	F06, F07, N01, N02, N03, N05, N06, T01	7	15
2.3.3	Soil Contamination Area South of the Turntable (TSF-06, Area B) Site Description and Alternatives	59-61	N01, N02, N05, N06, T01	5	5
2.3.4	Disposal Pond (TSF-07) Site Description and Alternatives	62-68	F07, F08, F12, N01, N02, N06, N07, T01	6	14
2.3.5	Burn Pits (TSF-03 and WRRTF-01) Site Description and Alternatives	69-73	F06, F07, N01, N02, N05, N06, N07, T01	7	18
2.3.6	Mercury Spill Area (TSF-08) Site Description and Alternatives	74-78	F06, F07, F11, F12, N01, N05, N06, N07, T01	7	13
2.3.7	Fuel Leak (WRRTF-13) Site Description and Alternatives	79-81	F06, F07, N01, N02, N06	5	14
2.4.1	The Snake River Plan Aquifer/Groundwater	82-83	F01, F07, N01, N03	3	10

a. Comment category and response numbers are those used in the Responsiveness Summary, Part III of this ROD.

b. The number of Commentors is an estimate of separate individuals or organizations submitting comments one or more times on the TAN proposed plan. Individuals or organizations that submitted more than one set of comments, or spoke at a public meeting in addition to submitting comments, are counted only once.

Index of Public Comments and Responses by Commenter

Name of Commenter	Organization or Affiliation (as shown or stated in comments)	City (and State, if not Idaho)	Number of Pages Submitted	Document Number Assigned	Number of Comments Identified	Number of Issues of Concern	Appendix Page Numbers
Schmalz, Bruce L.		Idaho Falls	1	F01	2	2	3-4
Harten, Kenneth		Pocatello	4	F02	5	7	5-8
Detonancour, D.H. "Doc"	Local 2-652 President, Oil, Chemical and Atomic Workers International Union (AFL-CIO)	Idaho Falls	1	F03	1	2	9
Barr, Stephen L.		Kuna	1	F04	2	2	10
Hinman, George W.		Pullman, Washington	1	F05	5	6	11-12
R.M.L.		Rigby	4	F06	21	29	13-20
Christopher, Jim		unknown	8	F07	45	59	21-30
Loveland, KayL.in	DOE Program Manager, Envirocare of Utah, Inc.	Salt Lake City, Utah	2	F08	6	6	31-33
Timm, Christopher M.		Albuquerque, New Mexico	1	F09	6	7	34-36
Broschious, Chuck	Environmental Defense Institute	Troy	7	F10	12	13	37-45
Farrar, Lawrence C.	Montec Associates	Butte, Montana	2	F11	1	1	46-47
INEEL Citizens Advisory Board	INEEL Citizens Advisory Board	Idaho Falls	2	F12	9	10	48-49
Christopher, Jim		unknown	8	N01	50	54	50-63
[name not provided]		unknown	1	N02	6	8	64
Broschious, Chuck	Environmental Defense Institute	Troy	10	N03	16	21	65-75
Commander, John	Treasurer, Coalition 21	Idaho Falls	2	N04	8	8	76-77
Brailsford, Beatrice	Program Director, Snake River Alliance	Pocatello	3	N05	13	16	78-83
Carpenter, Ted L.	Project Environmentalist, Tribal DOE Program, Shoshone-Bannock Tribes	Fort Hall	3	N06	12	13	84-87
INEEL Citizens Advisory Board	INEEL Citizens Advisory Board	Idaho Falls	3	N07	11	11	88-90
[name not provided]		Idaho Falls public meeting	2	T01	2	9	91
Allister, Pam	Snake River Alliance	Boise public meeting	1	T02	1	1	92
Broschious, Chuck	Environmental Defense Institute	Moscow public meeting	2	T03	2	3	94-95

Test Area North, Waste Area Group 1
Public Comment Document F1

Comment(s)

Response

Please return
this form
by March 18th!

Proposed Plan--Waste Area Group 1, TAN

02/17/98

What's Your Opinion?

The agencies want and need to hear from you to effectively decide what action to take at the Test Area North.

The statement on page five regarding uncertainties of risk is appreciated. Assessment beyond 100 years seems to be an extrapolation of an assumed hypothetical situation and a futile exercise. Expenditure of resources beyond elimination of current existing hazards should be carefully questioned. Contamination of ground water is not a subject of this Plan, however, concern and response could be questioned in this regard. Assuming that an organic contaminant is immiscible in water and that is volatile, a case could be made that it would be expelled to the atmosphere within 100 years at an insignificant concentration. It has been demonstrated that the regolith is permeable and a breathing effect occurs (IDO-12089). Various reports concerning radiological contamination at other INEEL locations verify that concentrations are attenuated as a function of various factors--distance, time, etc.

*(Continued on reverse)

If you want a copy of the Record of Decision and Responsiveness Summary, make sure your mailing label shown below is correct.

F1-1/25

The future resident exposure scenario considers a person who moves to the site (Section 6.3.1 of the comprehensive plan) is a complex task, and the section continues to be worked on intensively in its clarity while keeping it short. Suggestions are clear, and which still need improvement.

F1-1/25

F1-2/82

F1-2/82

The comprehensive RI/FS determine does not threaten the aquifer. The 15 Facility Injection Well determined or that this well is the source of ground last used as a disposal site in 1972. A plume below TAN is proceeding in a direction on this site is available in the

A-4



INEEL Environmental Restoration Program
P.O. Box 2047
Idaho Falls, ID 83403-2047

Address Service Requested

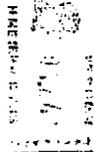


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FEB 2 1998

COMMUNITY PARTICIPATION
COORDINANCE

BRUCE L SCHMALZ
6445 SIDEMILL LN
IDAHO FALLS ID 83401-5939

|||||



Test Area North, Waste Area Group 1
Public Comment Document F2

Comment(s)

Respon

INEEL
Environmental Restoration Program
P. O. Box 2047
Idaho Falls ID 83403-2047

Kenneth Harten
51 Riverside DR.
Pocatello ID
83204-4024

Dear Sirs:

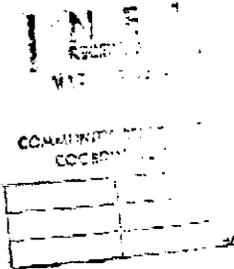
Thank you for the invitation to the meetings being held for comment on further cleanup procedures. You used to hold some of these meetings in Pocatello and I could go to them, but it is too much for me to go to an evening meeting in Idaho Falls at my age 81.. So I will send an article that I wrote about a year ago, saying what I thought about INEL, and the Beatrice Brailsford- Snake River Alliance diatribe. That article, which I didn't send at that time, is now enclosed. And even though it is very comprehensive, I think it still covers the ground in the way I still feel it should be covered.

You have had to spend too much time and MONEY cleaning up an area that is miles from being close enough to do anybody any damage.. This site was chosen years ago, because it was isolated and not near a center of population. If you were in France, they would kiss you and tell you to go ahead. But some people still think WE DON'T NEED ATOMIC POWER. I think they are all wrong.

Sincerely yours,



Kenneth Harten



F2-1/7

F2-1/7

The Agencies encourage citizen involvement. To ensure opportunities for public involvement meetings are conducted at multiple locations, interested parties can participate, despite the fact that INEEL provides other avenues for public participation. Postal addresses, telephone numbers, and addresses are provided in each proposal, briefings, or tours from Agency

F2-2/1

F2-2/1

The DOE is required to clean up areas that pose a risk to human health or the environment under the Environmental Restoration Program, which was passed by Congress. The Superfund program have a "bias for cleanup" is emphasized. The laws also require the Agencies (DOE, EPA, and ORCA) to investigate and undertake and complete activities to protect human health and the environment under the Federal Facility Agreement and Consent Decree. Cleanup activities must be cost-effective. The Agencies are evaluating three of the five balancing factors: long-term effectiveness and permanence; short-term effectiveness through treatment; and short-term effectiveness if its costs are proportional to the risks. The Agencies have determined in this case that human health and the environment are not close to major population centers and residents could be exposed to risks from

Test Area North, Waste Area Group 1
Public Comment Document F2

Comment(s)

Respon

SOME MORE EPA UNNECESSARY SPENDING

When the Environmental Protection Agency decided to make an example of the McCarty Salvage yard for pollution, they went all-out. THEY didn't have to pay for it. All the Idaho Power ratepayers paid for it every month, with their electric power bills. And it added up to \$7,000,000. I just talked to a man who worked on that clean-up in those white suits that were swelteringly hot in warm weather. But they had to be SAFE, even though the McCarty workers had worked around that same dangerous material for many years and none of them died from the hazards of the job. They didn't even complain of getting sick.

But the Idaho Power Co. loaded up all the waste material from the transformers which had contained PCB's from the oil-like contents of the electric transformers that were disposed of. The other part of the cleanup was the lead batteries that were broken and dumped for their lead content which was scattered in many areas around the McCarty field-- (mostly in the old highway gravel pit). They had to load this waste onto trucks and haul the resulting 500 loads to the Enviro-Safe waste disposal site south of Mountain Home. Those trucks carried about 40 tons per load, so you can see it was a tremendous job.

And for what good purpose? This waste had been lying there in the same area for (some of it) as much as 30 years. The EPA had 14 test wells drilled. They figure the cost would be around \$40,000 to clean it all up. They didn't find any appreciable pollution in any of the wells. There are two reasons for this: The Portneuf River joins into the Portneuf aquifer at the south end of the valley, where it enters at Portneuf Gap. It ceases to be a part of the flowing river and becomes part of a slow flowing lake or "aquifer," moving only about 15 to 22 feet per day. So it takes a long time for it to move down to the American Falls Lake, but it does eventually end up there, and most of it is used to irrigate Idaho's crops. The valley slopes from south to north. As it moves along it picks up some of our pollution and eventually gets it out of the Pocatello Valley. The sides of the city contribute to the flow, but water from the sides enters the aquifer slower than the flow from the south.

The second reason there was very little pollution from the lead is that the lead was not readily soluble in water, so it stayed where it fell, mostly at McCarty's. It's still there, except for such of it that was trucked down to Enviro Safe. The PCB's are more volatile and have long since escaped to the atmosphere. Besides that, it has been generally recognized that PCB'S are not certain to be carcinogenic or really very dangerous in the first place.

Now the EPA wants to spend another \$5,000,000 on cleaning up more of the site. It is now owned by Pacific Metals (after McCarty's went broke), a large interstate salvage company. The EPA will want to replace all of the contaminated soil with 15 inches of new clean soil. This will almost put Pacific Metals out of business or be ridiculously difficult to work around. And for what purpose?-- to protect the children from lead intake? What children? The little bit of lead that leaves the site is down along and under the Portneuf channel. There are not a hundred people (and probably no more than a dozen children) in that area, living in homes downstream from Pacific Metals. So how can you expect any harm to come from leaving the site alone? Nobody has been poisoned over the many years. So why spend another \$5,000,000 on it.

F2-3/
1, 3

F2-3/1, 3

The remedial actions proposed in this work. CERCLA cleanup focuses only eliminated by the cleanup activities.

See also the response to Comment F2

F2-4/25

Risk assessment is a complex task, an plans continues to be worked on inten improve its clarity while keeping it sh section are clear, and which still need

Lead is a naturally occurring metal th of which are toxic to humans. Ingesti exposure. The dangers of lead are gr the environment and accumulate in or permanent impairment, and death in b cause severe damage to the brain and Children are particularly sensitive to t their growth and development.

Polychlorinated biphenyls (PCBs) are principally used as insulating liquids, However, they were determined to be health because, when released into the down. PCBs may enter the body thro contact, where they may damage gast systems of the body or cause cancer. PCBs were phased out beginning in th

F2-4/25

The EPA's Internet site (<http://www.e> detailed toxicity information on merc

Assessments of risks and hazards from determined by scientific testing and a Chemicals and compounds for which (such as PCBs and diesel fuel) use ha tified through federal and state regula constantly continues to refine and rev:

<p align="center">Test Area North, Waste Area Group 1 Public Comment Document F2</p>	<p align="center">Comment(s)</p>	<p align="center">Respon</p>
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Better NOT spend it at all !!! Give the money back to our government for more needed projects.

The EPA has called or written comments on this project and they must be in Seattle by February 24, 1996. I would like to see the citizens of Pocatello to demand a public hearing to be held in Pocatello, before they start on the clean up this spring.

2-9-96

Kenneth Harten
Kenneth Harten

F2-3/
1, 3
(continued)

Test Area North, Waste Area Group 1
Public Comment Document F2

Comment(s)

Response

THE MIGHTY ENVIRONMENTAL PROTECTION AGENCY

During the last siege of drought we all sought means of saving water. One of your readers wrote a letter to Readers View commending the EPA for the fine job they did by demanding that the plumbing manufacturers make our toilets more efficient by cutting a gallon of water per each flush. The manufacturers (who had been making toilets for America for the better part of this century) promptly did as they were told, even though they knew it wouldn't work -- The EPA has free legal service.

When the flush just involves liquids, it saves water. But when the solids are involved, it won't perform correctly. They made and sold millions of these water-savers? And WE were a victim. To clear out the solids we have usually had to flush the toilet from 2 to 5 times, plus pouring one or two gallons of extra water down the toilet. This is dumb and very wasteful. Let the EPA learn to leave the people alone who know their business, because they are NOT expert at everything. Now we must spend another \$300 to change out the "water saving toilet," as will several million other customers..

A very expensive lesson in the North Idaho mining district taught the EPA nothing. They were determined to clean up the lead pollution, so they demanded the smelter build an 800-foot smokestack to get rid of the noxious fumes. That just shifted the fumes over to another county or into Montana. So they had it torn down, wasting millions of dollars. Then they decided to not only close the smelter, but shut down the whole silver and lead mining operation. They were trying to save the little children from brain damage by lead poisoning. 2700 jobs were lost in that area. Think of the tremendous social disturbance. Miners lost their jobs. Many lost their homes when they couldn't pay the mortgage payment. This probably wrecked many marriages, leaving the children without a father. The children probably suffered a great deal more than they would have if it had been left alone, without help from the Seattle EPA.

But there was a simpler way to handle this. The Japanese had already solved this problem in a mining district near their west coast. They found that Pacific kelp (elgin) would purge the body of the miners of any lead and they were healthy again. I mentioned this to a speaker at an environmental meeting in the old Bannock Hotel at a Chamber of Commerce meeting 25 years ago. He told me, "Yes. We know about this."

"Then why don't you use it, instead of removing 13" and replacing all the top soil from all the yards in Kellogg and Wallace. It would be much cheaper," I said. "But that's not the way we do things," he replied. Apparently the EPA has a LOT of Super Fund money to spend, and they are going to spend it, whether Uncle Sam goes broke or not.

Senator McClure came to the rescue by getting Congress to replace the many jobs by building a giant ski run and lift, in the area of the mine closings. It cost a lot of money. This whole event has proven to be an EPA disaster. But they don't care about that. They don't realize the U. S. is now broke and they have helped it along. And they don't mind closing down a whole statewide Idaho industry, and bankrupting Gulf Oil Resources in the process.

Kenneth Harten

F2-5/3, 34

The primary objective of the feasibility alternatives that will protect human health and the environment is to eliminate risks posed by each pathway at 300.430) directs that the alternatives include

- (1) the No Action alternative (which no remediation has already taken place)
- (2) one or more alternatives that provide engineering and, as necessary, institutional controls
- (3) a range of alternatives involving treatment of contaminants and, as appropriate, the contamination
- (4) one or more innovative treatment technologies that provide equal or better performance or implement lower costs in comparison to demonstrated alternatives

Three criteria are used to develop and evaluate alternatives (short-term and long-term), implementability, adequate protection of human health and the environment. Alternatives that are to be eliminated from further consideration are those that require equipment, special materials, or other resources that are not available or that would require equipment, special materials, or other resources that are not available or that would require equipment, special materials, or other resources that are not available or that would require equipment, special materials, or other resources that are not available.

See also the response to Comments F2

F2-5/
3, 34

Test Area North, Waste Area Group 1
Public Comment Document F3

Comment(s)

Respon

Please return
this form
by March 18th!

What's Your Opinion?

The agencies want and need to hear from you to effectively decide what action to take at the Test Area North.

Comments: *Whichever "Action" is taken at TAN I believe with safety & cost as the two primary drivers, the Resident site personnel should be the primary labor. These people "own the Area" & thus possess the experience and knowledge to deal with the issues*

Continued on reverse

* If you want a copy of the Record of Decision and Responsiveness Summary, make sure your mailing label shown below is correct.

F3-1/38

Most of the activities to remediate TAN by contractors, who may use qualified mates for remedial actions considered competitively bid within the local stabilization wages will apply. It is whether workers employed by their contractors of state sources. The contractor or contractors under this ROD will be required the necessary work.

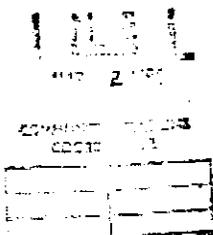
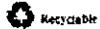
F3-1/38

A-9



INEL Environmental Restoration Program
P.O. Box 2047
Idaho Falls, ID 83403-2047

Address Service Requested



PO BOX 5008
IDAHO FALLS, ID 83408



D.H. "DOC" DETONANCOUR
PRESIDENT, LOCAL 2-028

TAN PIPE LINE

U.S. CHEMICAL AND
ATOMIC WORKERS
INTERNATIONAL UNION
AFL-CIO

826 6775
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WORK: 2047 CES-2047B
HOME: 2047 CES-2047C

FAX 208-524-9701

Test Area North, Waste Area Group 1
Public Comment Document F4

Comment(s)

Respon

Please return
this form
by March 18th.

10857 Relp for
Kuna, Idaho
83634
208-362-665

What's Your Opinion?

The agencies want and need to hear from you to effectively decide what action to take at the Test Area North.

Dear Mr. Hyle:

Comments: Thank you for that presentation in Boise Feb 24, 1998. Your answers are informative and interesting. You folks are wrapping up some spent clean-up projects. Keep up the fine work and build on a solid foundation for regular acceptance of a safer, secure and growing nuclear power industry. Had speed in our beautiful way.

Sincerely yours, Stephen Hyle

* If you want a copy of the Record of Decision and Responsiveness Summary, make sure your mailing label shown below is correct.

F4-1/7

The Agencies encourage citizen involvement. To ensure opportunities for public involvement meetings are conducted at multiple locations, interested parties can participate, despite the limited comment periods for both proposed and approved WAG 1. The proposed plan was revised to include requests for additional time to participate. A variety of topics are discussed in the response to the concerns of the public. Many ongoing cleanup programs are in progress. In addition, the INEEL provides public meetings including tours and briefings. Postal addresses, and Internet site addresses are available to get additional information, brochures, and representatives.

F4-1/7

F4-2/4

F4-2/4

The investigation and cleanup process for the FFA/CO for the INEEL signed in 1994 ensure that TAN remediation activities protect human health and the environment by providing additional responses, that meet standards set by DOE, EPA, and State of Idaho. The comprehensive RI/FS and this ROD are available.

The CERCLA process carried out for the FFA/CO includes public involvement activities, to ensure the public has a wide variety of site-related decisions, alternatives analysis, and selection of the CERCLA process with its public involvement hearing processes required by RCRA. The process is moving forward.

A-10



INEEL Environmental Restoration Program
P.O. Box 2047
Idaho Falls, ID 83403-2047

Address Service Requested



1997

Test Area North, Waste Area Group 1
Public Comment Document F5

Comment(s)

Respon

915 SW Fountain Street
Pullman, WA 99163
March 1, 1998

Jerry Lyle
Office of Program Execution
DOE Idaho Operations Office
P.O. Box 2047
Idaho Falls, Idaho 83403-9901

Dear Mr. Lyle:

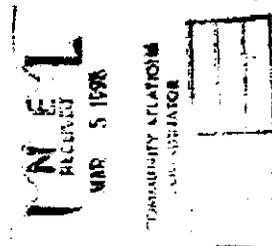
I attended the public meeting on Test Area North in Moscow, Idaho on February 26, 1998. The staff presentations there brought out the information that the planning horizon for the RI/FS for Waste Group 1 - Test Area North is 100 years. Apparently no account is taken of effects that occur after 100 years. Furthermore, I presume that no costs required for controls after 100 years are included in the RI/FS. While I agree that some limit on quantitative evaluations beyond a certain time in the future is appropriate, I believe that some qualitative account should be taken of risks that extend beyond the planning horizon. In the first place I believe that there should be a disclosure in the RI/FS, and the ROD, of risks that will occur beyond the end of the planning period and that have been omitted from quantitative consideration in some of the alternatives. The disclosure should describe the future situation including residual effects and remedial requirements and say that they have not been included. In the second place, the selection of the remedial action should accord a qualitative bonus score to an alternative that does not involve any residual effects over one that does. If two alternatives are reasonably close to equal, but one completes resolution of risks within the planning period, and the other does not, the one providing final resolution should be selected.

The RI/FS for the Test Area North does not take these effects into account in the descriptions of the alternatives so far as I could determine from the meeting. Many of the hazardous substances and some of the radionuclides in the wastes will still be present after 100 years. An argument that a marker would be left after 100 years at sites that still present some risk is not a strong one. If the marker would serve the purpose then, it should serve the purpose now; but the alternative of a marker was not considered adequate now in the RI/FS. An argument that any reasonable discount rate would discount costs after 100 years to a negligible amount is not appropriate or consistent with DOE policy in evaluating environmental liabilities. The government should not discount risks to future generations, and, indeed, the present evaluations of environmental liabilities by DOE and other government agencies do not do so.

These proposed revisions to the conduct of an RI/FS and ROD would extend to other cases besides the Test Area North.

Sincerely yours,

George W. Hinman
George W. Hinman



F5-1/14

The federal government has an obligation (i.e., limit access) to areas that the public and workers until that risk intended purpose. Achievement of that Congressional appropriation of sufficient entity charged to maintain the institution long as the federal government of the

F5-2/20

The selected action for each site that RI/FS must satisfy the CERCLA through Health and the Environment, and control that after remediation is completed, achievable threshold levels and that if control human health and the environment is controls, as appropriate. The final rule Part II, Sections 7, 8, and 9, of this I the environment will be protected from was made in the comprehensive RI/FS retained sites. Details on residual cost the Screening Data Gap Analysis, and Group 1 Operable Unit 1-10 Comprehensive

F5-1/14

F5-2/20

F5-3/42

F5-3/42

CERCLA guidance requires that re-evaluate nine evaluation criteria. The criteria criteria that relate directly to statutory screen alternative, (2) balancing criteria alternatives for the site by evaluating cost, and (3) modifying criteria that state agencies and the community.

F5-4/41

F5-5/15

The two threshold criteria, which mean overall protection of human health and ARARs. The five balancing criteria candidate alternatives, are (1) long-term tion of toxicity, mobility, or volume-ness, (4) implementability, and (5) community acceptance, are used in the final

F5-4/41

Institutional controls are ongoing activities health and the environment. Institutions such as deed restrictions, and physical physical structures such as embankment Institutional controls have relatively prominent of a CERCLA response, especially

Test Area North, Waste Area Group 1
Public Comment Document F5

Comment(s)

Response

F5-4/41 (continued)

trols. Institutional controls are not su
treatment or removal) as the sole rem
mined not to be practicable during the
where the remedial measure leaves co
potentially pose a risk to human healt
ed to maintain protectiveness. Site re
effectiveness of the institutional contr
any site at which radioactive contami
this ROD provides more details on in:

F5-5/15

The meaning of the comment may no
assessment cost estimates are prepare
cost estimates and revisions thereof p
dollars, as net present value (NPV) de
cost estimates are presented in the bo
to CERCLA requirements. DOE fund
mates. Further details about the cost
comprehensive RI/FS.

Test Area North, Waste Area Group 1
Public Comment Document F6

Comment(s)

Resp

01MAR98

Mr. Jerry Lyle
Office of Program Execution
DOE Idaho Operations Office
PO Box 2047
Idaho Falls, ID 83403-9901

Dear Mr. Lyle:

The following are my comments on the Proposed Plan for Waste Area Group 1 - Test Area North, INEEL. I trust they will receive due consideration as the agencies finalize the preferred alternatives for cost effective remediation of sites at TAN and presentation in the Record of Decision.

1. On page 11 it is stated that "The National Contingency Plan (NCP) requires that a No Action Alternative be evaluated." The text then contradicts itself by saying that in this proposed plan the no action alternative "was not considered further as a remedial action alternative." This proposed plan does not present/evaluate the No Action Alternative for any of the retained release sites as required by law. This is a major deviation from the NCP requirements, that should require, at a minimum, the U.S. EPA Region X Administrator approval, and possibly the approval of Congress. The no action alternative must be evaluated, as required by law, for each site, and if at that point in time it is found to not be protective of human health and environment, it is then not selected as a preferred alternative. In addition, this no action alternative should reflect minimal, if any, costs associated with it. In some cases, required long-term monitoring and minimal administrative costs are attached to a no action alternative. This no action alternative is obviously the lowest cost alternative.

2. I concur with the conclusion that the best course of action at the WRRTF Burn Pits and TSF-03 is to not excavate or perform any active remediation. As a taxpayer, I am appalled that the estimated cost to place markers at these sites and ensure the soil remains in place at both sites is over \$2.8M! These sites should be more accurately described as No Action sites, and the minimal costs for marker placement and site caretaking be more accurately estimated and included under the description of what is considered "no action".

3. The Mercury Spill Area (TSF-08) is described as having "low levels of mercury are below 4 feet below ground surface" following a 1995 removal action. First, why was this mercury not properly removed during the 1995 removal action? As a taxpayer, I don't like paying twice for remediation. Secondly, the text continues to state that the risk is caused by "ingestion of homegrown produce causes and unacceptable risk." How does mercury at a depth of 4 ft. below the ground surface get taken up by garden plants with root systems that rarely exceed 1 or 2 feet below the ground surface? The EPA typically used a homegrown produce root zone depth of 8". This calculated risk appears to be the result of ultra-conservatism used in the risk calculations. Thirdly, the residential total cancer risk is shown to be 1E-04 on Table 1., which has typically been the agencies' "threshold risk value" for defining acceptable/unacceptable risk.

F6-1/43

The No Action alternative must be study to comply with requirements section 40 CFR 300.430(e)(6) investigations and feasibility studies some removal or remedial action. The No Action alternative provide be compared during the evaluation. CERCLA evaluation threshold with ARARs may or may not on the particular characteristic alternative does not meet the threshold alternatives that do meet the threshold only the alternatives under considered plan.

F6-1/43

Section 12 of the WAG 1 comprehensive alternatives for each site requiring native. In the revised proposed plan for the V-Tanks (TSF-09 and TSF- Contamination Area South of the 1 ation demonstrated that the No Ac

F6-2/70

The reevaluation of the alternative ment led to development of a new preferred alternative.

F6-2/70

F6-3/75

The initial cleanup of mercury was 1950s and 1960s. Standard procedure mercury. During later cleanup acts were based on soil ingestion risk-RI/FS, the Mercury Spill site was ingestion risk-based concentration soil ingestion, because mercury concentration remaining contamination exceeded

F6-3/75

F6-4/
74, 76, 27

F6-4/74, 76, 27

The commenters are correct that humans. The November proposed sion in the table presenting risks.

One assumption used in the hypothetical resident might excavate a basement whichever is less, and spread the

Test Area North, Waste Area Group 1
Public Comment Document F6

Comment(s)

Respo

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F6-1/43

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F6-1/43

F6-2/70

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F6-2/70

F6-3/75

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F6-3/75

F6-4/74, 76, 27

F6-4/74, 76, 27

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One assumption used in the hypothesis is that the resident might excavate a basement whichever is less, and spread the excavated material.

**Test Area North, Waste Area Group 1
Public Comment Document F6**

Comment(s)

Response

F6-4/74, 76, 27 (continued)

their home. Produce grown in the crop pathway of risk to the future resident. conservative risk assessments to ensure crop health and the environment.

Uniform CERCLA regulations/processes used in the comprehensive RI/FS below acceptable levels. The alternatives subsequent to them are likewise required to relate to acceptable levels.

Test Area North, Waste Area Group 1
Public Comment Document F6

Comment(s)

Response

Given the apparent conservatism to the risk assessment and the calculated risk at the threshold value, I recommend the agencies reconsider this site as a no action site, instead of proceeding with a \$810K remediation with questionable cost effectiveness and risk justification

F6-5/77

F6-5/77
Based on low community support expressed about treatment of the cc removed from this ROD. A phyton at the site. Based on the results of mination will be made as to subseq

4. Common sense and responsible environmental science should be applied to the WRRTF-13 Diesel Fuel Leak (WRRTF-13). How can the agencies justify the expenditure of over \$1 million of our taxpayer's dollars on this site? (especially after an initial tank/soil removal action that wasn't completed properly?) The agencies description of this site on page 8 indicate that "risk was not calculated in the baseline risk assessment"; however, a subsequent sentence reports that "the post-removal sample results... indicates TPH concentrations... below the TPH risk-based corrective action concentration of 162,000 mg/kg". The maximum soil TPH concentration is about one fifth of this corrective action level? How can the agencies justify any further action at this site? Either there is unacceptable future risk or there is not. If there are characterization data gaps, then go collect additional samples for analysis. It would be interesting to know what the average post-sample TPH concentration was, and what the agencies "limit of concern" is for this site...in other words, are we worried about one cubic foot, one cubic yard, or 100 cubic yards of contaminated material left in the ground at above risk-based levels?

F6-6/79

F6-6/79
It was previously a common practice termination as possible when fixing During one of the tank removals, sation of a nearby tank. The various results can be found in the Track 2. Because diesel and petroleum prod typical risk assessment cannot be p ination was compared against a cur During the period when the RI/FS i Risk Based Corrective Action (RBC agreed to utilize these standards as

If this were a petroleum release at a commercial site outside of the INEEL, the State of Idaho (risk-based corrective action) RBCA process would be applied, and the decision would likely be that the residual diesel contaminated soil at 5 to 10 ft bgs poses no occupational or groundwater threat; and therefore no further action is required. Even if we assume a hypothetical resident wishes to install a basement 100 years from now at this location, by that time significant natural degradation (volatilization, biodegradation, geochemical reactions) will have occurred, further lowering the TPH concentration.

F6-7/30

F6-7/30
The remedial action objective for th the revised (November 1998) prop petroleum hydrocarbon constituents dance with the State of Idaho Risk- was changed in this ROD to: "Prev stituents in accordance with the Sta ance." The 1,000 mg/kg reference conform to the State of Idaho Risk- January 1, 1997. This change is de

Given the limited dollars in the INEEL ER budget and congressional scrutiny of INEEL cleanup efforts (Pit 9 Project), the agencies should think twice about retaining a no (unacceptable)-risk sites like WRRTF-13 to the Proposed Plan. If this site is retained for "limited action", the only costs should be to maintain institutional controls (signs and ensure soil cover is intact)...and certainly should not cost the taxpayer \$1.4M! Why are the INEEL cost estimates so apparently inflated? In my opinion, this site is a prime candidate for a truly No Action alternative.

F6-8/1, 17

F6-8/1, 17

5. Further study of the rationale stated for the preferred alternatives for TSF-08 and WRRTF-13 reveal two opposing schools of thought regarding leaving contamination in place. At TSF-08 the preferred alternative is excavation and off-site treatment for mercury contaminated soil, amazingly at a cost of \$810,902, which is one half a million \$ lower than the "limited action" alternative (why is limited action so costly?). The rationale provided is to provide a "more permanent action," and long term monitoring and institutional control would not be required. Conversely at WRRTF-13 where again the excavation & land farming alternative is cheaper than "limited action," and provides a permanent solution, the agencies mysteriously select the more expensive "limited action" alternative, which leaves contamination in place and requires long-term monitoring

F6-9/2, 80

F6-10/17, 35

F6-9/2, 80
The DOE is required to clean up ina to human health or the environment, which was passed by Congress in 19 posed by hazardous waste sites. The a "bias for action." This means that laws also stress the importance of p thoroughly investigate and undertak necessary to protect human health a mented in the Federal Facility Agree
Cleanup activities must be cost-effi evaluating three of the five balanci long-term effectiveness and perma through treatment; and short-term cost-effective if its costs are propo
Operations and maintenance costs and analysis, routine maintenance,

Test Area North, Waste Area Group 1
Public Comment Document F6

Comment(s)

Response

If one assumes WRRTF-13 truly poses unacceptable future risk, then it is a no-brainer to see that the excavation and land farming is the obvious choice, since it is a permanent solution at the lowest cost. Risk from worker exposure to TPH contamination during remediation is controllable, and should be minimal. Compared to potential exposure to mercury during the TSF-08 remediation, WRRTF-13 poses less worker exposure risk due to the greater concern with exposure to mercury vapor and mercury contaminated soil as compared to petroleum contaminated soil (which by the way, is routinely handled by INEEL workers during landfarming of petroleum contaminated soils at CFA).

6. The agencies' approach to evaluating risk and decision-making is questionable in regards to the TAN V-Tanks.

First, on page 9, the proposed plan states that "The risk from these liquids and sludges was not calculated in the OU 1-10 Comprehensive RI/FS because there is no evidence the tanks have leaked." How can the agencies justify spending \$10.4M for a CERCLA action at a site where the risk has not been defined? Secondly, if one studies Table 5 of the Proposed Plan, one will note that the preferred remedial alternative (Alternative 4) ranked the lowest of all the alternatives evaluated for short-term effectiveness, implementability, and cost. Furthermore, if one tallies the total scores for each alternative on table 5, the preferred alternative (Alternative 4) has the lowest composite score of all alternative! How can the agencies justify spending \$10.4M for a CERCLA action with no defined risk and using a preferred alternative that is ranked the lowest of all options evaluated? Thirdly, the only defined risk at the V-tanks is external exposure to radionuclide contaminated soil. How will ISV of the soil and tanks significantly reduce the risk from external exposure from these soils unless they are removed? How can the agencies justify spending \$10.4M for a remedial alternative that will not address the only documented risk at the site? And finally, the risks presented on Table 1 of the Proposed Plan are very similar for the V-tank site and the PM-2A tank site, the contaminants are very similar, but it is not clear why the preferred alternative for the PM-2A site (alternative 4a, which ranked highest in the Table 6) is significantly different than the preferred alternative selected for the V-tanks.

It is very likely that even if one assumed the tanks released their contents to the environment, there would be no unacceptable future groundwater risk, and since the material would be below 10 ft. bgs, there would be no future residential risk. Assuming the material in the tanks does not pose unacceptable risk, even if released, then the next issue is compliance with ARARs, specifically the presence of PCBs and hazardous components in the tanks.

The ARAR issue can be addressed by treatment of the tank contents (as discussed in the Proposed Plan), or by requesting an ARAR waiver. If the risk assessment demonstrates that this residual sludge liquid in the tanks do not pose unacceptable risk to human health and the environment, then why not consider requesting an ARAR waiver for the PCBs and RCRA materials? This approach offers truly cost effective environmental protection for the public and INEEL workers.

F6-9/
2, 80

F6-11/47

F6-12/52

F6-13/
47, 53

F6-14/
50, 57

F6-15/47

F6-16/
47, 48

F6-11/47

Since the V-Tanks have not leaked, not eligible for calculation of risk i

The tank contents were included in Agencies. Sufficient information o the potential risk and to evaluate re Remediation of the site would be n release has occurred. It is more co they have leaked and at the same ti remediated at this time. Timeliness treating the tank contents now, in s release has occurred. It is true that being any exposure pathway. Good leave these constituents in place.

F6-12/52

A treatability study of planar ISV, s ISV, was carried out in 1998 for the *Treatability Study for Planar In Sit Tanks*, October 1998 (INEEL/EXT-Record. The results of the study d implemented and would have high and surrounding the V-Tanks. The as shown in the November 1998 re cally is less costly than the multiple mixtures of organic and heavy met

F6-13/47, 53

Planar ISV could simultaneously tr arduous materials in the V-Tanks (in surrounding the tanks. The planar Superfund projects to date. Previo show that planar ISV could be exp and surrounding contaminated soil

See also response to Comment F6-

F6-14/50, 57

The COCs at these two sites are sit the V-Tanks. The PM-2A Tanks co liquid, while the V-Tanks contain n

Test Area North, Waste Area Group 1
Public Comment Document F6

Comment(s)

Response

F6-14/50, 57 (continued)

these differences, similar alternatives in strong differences in their overall in situ vitrification (ISV) has now been to be feasible for tanks up to the size of PM-2A Tanks are 50,000 gal and the detailed descriptions of the alternatives developed in the comprehensive RI/FS and the Feasibility Study.

F6-15/47

See response to Comment F6-11, above.

F6-16/47, 48

The Agencies are not in favor of requesting that the Agencies must meet certain specific requirements, and that concurrence be obtained from the State. State concurrence for the selected remedy for the V-Tanks sites – Tank Contents, and Disposal – will address removing the source of contamination and protecting the receptor may be exposed. Specific remedial actions to be specified in the remedial design.

See also response to Comment F6-11, above.

Test Area North, Waste Area Group 1
Public Comment Document F6

Comment(s)

Response

If the agencies are dead-set against the ARAR-waiver approach (we don't want to set a precedent!), then they should focus on clearly defining what the remediation requirements are for both the rad-contaminated soils at this site, as well as the V-tank contents. Was the feasibility of using in situ biodegradation to degrade the PCBs and other organics in the sludge considered? It has been demonstrated that PCBs are biodegradable (General Electric has done notable work in this area). Was the feasibility of PCB dechlorination methods evaluated as a treatment option?

Clearly, ISV offers the most "robust"-appearing treatment technology, however, these "robust" treatment technologies when applied in radiological environments seem to very often be unreliable and extremely costly. If the agencies wish to use the V-tank site as a technology demonstration site for ISV in lieu of other more cost effective and reliable alternatives, then this should be openly presented to the stakeholders. The INEEL has had more than its share of "proven technologies" that were in fact still in the developmental stage and selected for deployment, only to have them fail miserably (Pit 9, initial TAN groundwater treatment). There are many important considerations regarding application of ISV at the V-tanks. You are putting the tank contents at a much greater risk of being inadvertently released to the environment as compared to any other remedial alternative; and as a professional environmental scientist and member of the public, I am very concerned about this. What is the likelihood and consequences of an accidental airborne or subsurface release of contaminants from the tanks' interior, or the incomplete "melt" of the tank soil contents matrix?

I fully support the INEEL's efforts to test, evaluate and apply innovative or developing remedial technologies (this must be done if the lab hopes to keep their ER staff employed in the future), however, please be more upfront with the stakeholders regarding the rationale, programmatic risks, and overall cost benefit of selecting ISV as the preferred alternative for the TAN V-tanks.

7. Based on the costs estimates found in this Proposed Plan, the total estimated cost to perform final remediation activities at TAN is \$24.9M. Included in this figure is \$5.9M for "Limited Actions" at four sites (TSF-07, WRRTF-01, TSF-03, and WRRTF-13). Careful review of exactly what activities are included under the remedial alternative called "Limited Action" for these four sites tends to indicate that the cost to "close out" these sites is grossly overestimated, and is close to fraudulent representation of reality. If these cost estimates for limited action subsequently become the basis for outyear budget requests, then clearly the taxpayer/stakeholders are being misled and fraud committed. Serious consideration of the accuracy of these cost estimates must be given before the agencies use this cost data in aid in selecting the final remedial alternative for the ROD. In addition, our DOE budget profiles for 1998 and outyears support the expenditure of exactly \$25M for TAN ER activities.

Thank you for providing me with the opportunity to comment.

R.M.L. QEP
Rigby, ID

F6-17/49

F6-16/
47, 48
(continued)

F6-17/49

F6-18/53

F6-19/17

F6-20/14

F6-21/7

Individual treatment of PCBs would be less expensive at this site. Biodegradation of dioxin compounds ("organics"), including PCBs, metals and radionuclides would be more effective and cost-effectiveness require this site that would treat all contaminants. Pretreatment of some contaminants (e.g., PCBs) prior to subsequent treatments for other contaminants would be more effective.

F6-18/53

Planar ISV is an enhancement of conventional ISV that have occurred using conventional ISV matrix from the ground surface down below the melt resulting in pressure build-up from the melt pool, overheating of the melt, and upsets. Planar ISV resolves these issues by allowing the melt to flow outward toward the center so the vapor can be safely removed. Reliability problems with conventional ISV.

Planar ISV could simultaneously treat hazardous materials in the V-Tanks (including dioxin) surrounding the tanks. A full-scale demonstration of TSCA requirements was successfully performed on dioxin at the Chemical Superfund Site in Salt Lake City of over 99.99% was demonstrated. The demonstration was for use on four Superfund projects to date.

For the V-Tanks treatability study, two soil samples from the TAN site, demonstrated that a pilot scale and configuration to process dioxin was performed on a 4,500-gal scaled-down tank of sludge and liquids, including a non-hazardous material. The tank space in the tank was filled with soil. The tank was developed symmetrically with no hazardous materials present in the actual V-Tank. The tank was successfully treated with no hazardous materials. Post-test chemical sampling data indicated that in the bottom of the tank, the cesium was retained in the soil were also remediated. The melt (metal and wood) that were processed during the process. Although organics were not successfully demonstrated previously that organic contaminants while ensuring effectiveness. The vitrified block was excavated.

Test Area North, Waste Area Group 1
Public Comment Document F6

Comment(s)

Response

F6-18/53 (continued)

tiveness. The concentration of cesium were shown to be essentially uniform. However, the treatability study also included in the cost estimate prepared for the proposed plan. As a result, the Altern Tanks sites increased by 50%, lowering cost-effectiveness.

At the same time, two commercial facilities for the tank contents, increasing the in Tank Removal, Ex Situ Treatment of are permitted to dispose of mixed waste. Tanks alternatives were reevaluated to cost and the off-site treatment available. Alternative 2 would have equally high cost and greater cost-effectiveness compared to Alternative 1. Alternative 1 was selected as the remedy for the V-Tank alternatives for the V-Tanks are in Par

F6-19/17

See the response to Comment F6-8, a

F6-20/14

The federal government has an obligation to limit access to areas that pose a risk to the public and workers until that risk is reduced to an acceptable level for the intended purpose. Achievement of that purpose requires Congressional appropriation of sufficient funds to the entity charged to maintain the institution. As long as the federal government of the

F6-21/7

The Agencies encourage citizen involvement in the decision-making process. The WAG 1 proposed plan was revised in response to public comments. The cost estimate was extended in response to public requests for more information in the decision-making process.

Test Area North, Waste Area Group 1
Public Comment Document F7

Comment(s)

Response

March 7, 1998

Ms. Kathleen Hain, MS 1118
U. S. Department of Energy
785 DOE Place
Idaho Falls, ID 83401

Mr. Wayne Pierre
Region 10
U. S. Environmental Protection Agency
1200 Sixth Avenue, HW-113
Seattle, WA 98101

Mr. Dean Nygaard
Division of Environmental Quality
1410 North Hilton Street
Boise, ID 83706

Dear Remedial Project Managers:

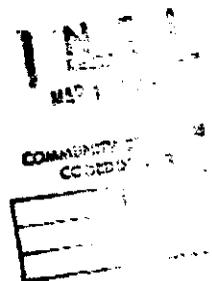
I am submitting comments on the (NEEL WAG 1 Proposed Plan. It is incomplete, inadequate, poorly researched, and should be withdrawn until these deficiencies can be corrected. Once again the FFA/CO agencies have chosen to pursue schedule and budget issues rather than meet minimum standards of quality, professional pride, regulatory compliance and environmental protection.

It is particularly disturbing that this document has been produced well ahead of the FFA/CO deadlines when time existed to conduct proper investigations and treatability studies prior to finishing the RI/FS and this Proposed Plan. Also disturbing is the failure of all three agencies to fully inform the public of the complete history of some of the sites; contaminants present; regulatory requirements; the possible need for ARAR waivers; and that significant quantities of PCBs and RCRA hazardous waste will be left in de-facto landfills above the Snake River Plain Aquifer.

I do not know how carefully each of you has reviewed these sites and the Proposed Plan or to what extent you relied on subordinate WAG managers. But this Proposed Plan in general, and several preferred Alternatives in particular, are unacceptable. I strongly urge all of you to do a better job.

Sincerely,
Jim Christopher

cc. w/attachment
Ms. Linda Caballero, IDIIW
Mr. Charles Clarke, EPA
Mr. John Wilczynski, DOE-ID



A-21

F7-1/8, 10

F7-1/
8, 10

The proposed plan was revised and became available to reevaluate all Agencies factored in newly available remedial alternatives became available and considered. Two treatability studies were developed for several sites changed. A Feasibility Study Supplemental alternatives and reevaluate the proposed plan issued in November 1997, but also presented an amplified for the best final selection of remedial

F7-2/19

F7-3/
8, 10

F7-2/19

This publication followed the FFA/CO by the Agencies to permit a second round of Any additional investigations carried out to support the design of the selected

F7-3/8, 10

See response to Comment F7-1, above

Test Area North, Waste Area Group 1
Public Comment Document F7

Comment(s)

Response

Comments on the WAG 1 Proposed Plan

F7-4/10

See response to Comment F7-1, above
F7-5/13

The possibility exists that contamination of INEEL FFA/CO or in this comprehensive future as a result of routine operations and dismantlement (D&D) activities the process for new site inclusion definitions pursuant to the RAOs and final remediation. The comprehensive RI/FS process at potential release sites. Active operations under various company manuals control procedures.

F7-4/10

F7-5/13

F7-6/
21, 22

F7-6/21, 22

Co-located facilities is a term developed near or adjacent to sites included in the process and that are still in use or in operation, an analysis of 89 such facilities a extent to which they could contribute to potential future releases. These sites are: First, there could be contamination predictions of the structure (such as in piping) until the structure is dismantled. Second, the potential for a future release to the analysis evaluated the possibility for future past activities at these and similar facilities potential to contribute to future risk at asphalt pads outside the Radioactive P buildings (TAN-647 and -648), and the and Transfer/Storage buildings (TAN-649) threat of release; their retention is not as documented past releases at these sites. At TAN, these sites are covered under the same procedures. The potential for these retained very remote. The analysis of co-located facilities that apply to them are in Appendix A. TAN-616 is a liquid waste treatment and evaluation because of potential for releases and pipes.

F7-7/21

F7-8/
63, 64

F7-9/75

TAN-666 is a radioactive liquid waste use. It is authorized for operation under the Contingency Plan.

LOFT-02 is a disposal pond constructed and now used only for sanitary wastewater operations. The comprehensive RI/FS analysis in soil at the LOFT-02 pond is below

1. This document is more remarkable for what it does not say than what it does. It fails to fully inform the reader of many important facts which are necessary to a fully informed decision. In summary, DOE and the agencies are prevaricating through omission.
2. Page 5 - Summary of Retained Sites - "Past releases that have not been discovered... have the potential for producing unacceptable risk and were evaluated... in the RIFS." How can releases which have not been discovered be evaluated? Bounding calculations might be possible, but undiscovered releases, as discrete units, cannot be evaluated. Suggest changing the wording.
3. Pages 5 and 6 - Summary of Retained Sites - This section states that several "co-located" facilities are still in use and will be evaluated after operations cease. These facilities include TAN 616, TAN 666, the LOFT pond, and the RPSSA. The first three are out of service now. The RPSSA soil contamination area (east of the railroad tracks) is out of service and can be evaluated for radiological contamination and the need for remediation. Do so. The other parts of the RPSSA (TAN 647, 648, and the storage pad) are still in use. Part of TAN 647 and adjacent storage pad have interim status under RCRA (mentioned on pages 9 and 16). Any risk or remediation will be addressed during RCRA closure and should not be duplicated in CERCLA. The other three facilities are closed now. TAN 616 has been out of service since the 1960s or early 1970s. The LOFT pond was taken out of service in the early 1990s. TAN 666 was an interim status RCRA unit which was closed under RCRA. It need not be included in the Proposed Plan. Stop prevaricating to the public.
4. Pages 5 and 6 - Summary of Remedied Sites - The concept of "co-located" facilities has no basis in CERCLA or the FFA/CO and should be removed from this Proposed Plan. This Proposed Plan and the ROD should address only those facilities/releases identified in the FFA/CO. All other units or facilities should be addressed under other applicable regulatory systems such as RCRA and TSCA - which are both applicable to TAN 616.
5. Page 6 - TSF-07 - The site description and history fails to mention the illegal removal action, called a "best management practice" conducted in the early 1990s. The action removed and grouted sediments from the pond inlet. This pond was sampled several years ago. Was the risk estimate based on the contaminants found at the time of sampling? How did the risk assessment account for the continued discharge since sampling was conducted? Are metal concentrations in pond sediments STILL below risk levels? The pond cannot be both a "co-located" facility and a CERCLA site in the FFA/CO. Which is it?
6. Pages 6 and 7 - TSF-07 - Mercury is found all along the tracks within the TAN area, from the site of the removal action over to TAN 648, yet no mention is made of this in the site description. Was the rest of the track contamination considered during the investigation?