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Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: **EPA Comments on Proposed Plan for the Contents of the V-Tanks at TAN OU 1-10**

DATE: **February 25, 2003 and others** **REVIEWER:** **Environmental Protection Agency**

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
G1		(see p. 4)	A brief discussion of the ESD, including why it was needed, should be included in the site history section.	Accepted. An "Info" discussion of the ESD will be placed in the sidebar.
G2		(see pp. 9)	The use of on site and off site in the proposed plan needs to be reviewed. EPA recommends using the phrases "within-TAN," "on-INEEL" and "off-INEEL" instead, particularly in regards to the management of waste. Note that the definitions of "on-site" and "off-site," as found in the sidebar on page 9, are incorrect.	The definitions on p. 9 have been deleted and "on-Site" and "off-Site" will no longer be defined terms.
G3		(see p. 5)	It should be made clear in the proposed plan that the action addresses a tank system. For example in the second paragraph and the last line on page 5, the text should be revised to state "the V-tank system."	Accepted. An "Info" discussion of the RCRA closure plan will be placed in the sidebar.
G4		—	Is the nation to nation consultation with the Shoshone Bannock tribes been scheduled at this time? EPA has found it necessary to get such meetings scheduled well in advance in order to find a mutually agreeable time for the consultation.	Accepted. Briefings with the Sho-Bans and stakeholder groups expressing interest are being scheduled for the week of April 7.
G5		—	[From Matt Wilkening 3/4/03 1:51 p.m. e-mail] (a) Removing the definition [of on-Site and off-Site] will help in getting this through EPA approval. (b) Numerous places in the document it states "would be disposed of on-Site at the ICDF" while other places it states "will be disposed at ICDF" (change to the appropriate tense as needed). (c) Also, do not capitalize "Site." (d) Another suggestion to replace "on site" is "at the facility." Does this help or does it still create the same issue as "on INEEL?"	(a) Accepted. See response to EPA's General Comment 2. (b) Accepted. This and similar changes will be made throughout the document to enhance clarity and readability. (See DOE Comment G1.) (c) Rejected. (d) Rejected. "Facility" also has a regulatory meaning that we do not want to invoke.

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SPECIFIC COMMENTS				
1	*Site History*	5	a. This section lacks any discussion about what was the mission at TAN. b. Also, include some brief background information on what drove the large cost increase, such as storage cost, cost for separating sludge from liquid, etc.	a. Accepted. The information on p. 6 regarding the Aircraft Nuclear Propulsion Program was inserted at the end of the 5th sentence. Pursuant to EPA Guidance (OSWER 9200.1-23P), additional historical information is not needed beyond what was already presented in the 1998 Proposed Plan and the 1999 ROD. b. Accepted. See resolution to IDEQ Comment 8.
2	Margin definition: *volatile and semi-volatile organic contaminants*	5	Volatile and Semi-volatiles. Note that even low concentrations of dioxins can lead to cancer. EPA recommends revising the language to read "Exposure to VOCs and SVOCs can damage body tissue…"	Accepted. See response to IDEQ Comment 9.
3	*Summary of Site Risks*	6	This section emphasizes the potential risk posed by mercury, cadmium, etc., but does not discuss the radionuclides in the same detail. However, it is the radionuclides that drive the risk at this site.	Accepted. See response to IDEQ Comment 10.
4	*Site Characteristics*, 1st para.	5	Include a sentence after the second sentence stating that monitoring has indicated that even though the tanks have exceeded their design life there are no indications that they have leaked.	Accepted. A new third sentence (that parallels a similar statement in *Site History*, p. 4, para. 3, 2nd sentence) will be added.

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18	*Site Characteristics*	5	[From Matt Wilkening 3/4/03 4:54 p.m. e-mail] We need to beef up our discussion about the tank contents. Specifically, the issues of the PCB content of the tank and the TRU content of the tanks needs to be addressed in more detail. Most of this could be added to *Site Characteristics* on page 5. We need to provide the public the additional details on why the PCBs are being addressed as they are and why the TRU content of the waste meets the acceptance criteria for the ICDF. 1st para: replace the last of the sentence with the following, " … varying amounts of radioactive sludge and liquid that contains metals, PCBs, VOCs, and SVOCs (see Table 1). 2nd para.: Add a sentence at the end that states these 4 tanks comprise a tank system that will be remediated by the alternative selected through this process. 3rd para.: This paragraph could also contain the information about the PCBs and the fact that they are radioactive instead of the introductory paragraph. But more details should be included in regard to the various concentrations of the contaminants, particularly the PCBs and the radionuclides.	Accepted. (1) The complex nature of the waste was addressed by the following changes. (a) The first sentence of the first paragraph at the top of page 4 was modified to read "The tanks contain various amounts and concentrations of radionuclides, organic compounds including polychlorinated biphenyls, or PCBs), and inorganic compounds (including metals such as mercury). (b) The first sentence of the first paragraph in Site Characteristics on page 5 describing the V-tanks as holding "varying amounts of sludge and liquid waste that contains both hazardous and radioactive chemicals." (c) The first sentence of the third paragraph of Site Characteristics on page 5 was modified to stress the complex mixture of contaminants including "transuranic and other radonuclides, inorganic contaminants (including metals such as mercury), and volatile and semi-volatile organic compounds (including PCBs). " (2) The treatment of the waste as one waste stream was addressed by the following changes. (a) The last sentence of the first paragraph of Site Characteristics on page 5 was modified to show that we will manage the waste as one waste stream. "The tanks are part of an interconnected waste handling system, and the contents of all four tanks are considered one waste." (b) The second sentence of the third paragraph of Site Characteristics on page 5 was modified to state that "The waste from the individual tanks will be combined, as necessary, to facilitate treatment as one waste stream. (3) The management of the PCB is discussed in the ARAR box on page 8 third column. "Sludge with PCB concentrations over 50 mg/kg is regulated as PCB remediation waste and must meet regulations under the Toxic Substances and Control

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				Act (TSCA). To meet these requirements, a Risk-Based Petition under 40 CFR 761.61(c) will be prepared and submitted as necessary. The Agencies will prepare any required petitions as part of the Record of Decision Amendment." (4) The ability of this waste to meet the ICDF acceptance criteria is addressed in the sidebar on page 15. "Waste that contains transuranic radionuclides in concentrations greater than 10 nCi/g cannot be disposed of at the ICDF. The concentration of transuranic radionuclides in the untreated contents of the V-tanks is approximately 4 nCi/g."
5	*Site Characteristics*, 1st para.	7	Was any 1,4 diokane detected during the analysis of the VOCs? Diokane is a stabilizer for solvents such as TCA and has been found to pose potential environmental problems. 1, 4 Diokane is becoming an issue at EPA HQ.	Noted. While 1,4-dioxane has not been previously sampled for at the INEEL, it will be considered in future sampling activities.
6	Table: *CERCLA Evaluation Criteria*, Cost Criterion	7	The statement about cost being proportional to the overall effectiveness is not part of the nine (9) criteria. It is only a determination of cost effectiveness based on statute. This sentence should be dropped from this table. Further discussion by Matt Wilkening (3/4/03 2:12 p.m. e-mail): Information on costs and comparison on costs should be in the nine criteria analysis; a discussion of cost effectiveness (or a declaration of cost effectiveness does need to be in the statutory determinations of a ROD. So both do have to be covered – just in difference places and in different ways.	Accepted. The graphic element on p. 7 is designed to provide the public a brief, very generalized overview of the process used to evaluate alternatives. This graphic is used only in proposed plans, since those documents are designed to provide a high-level ("20,000 ft") summary of the Agencies' plans for the release site. We agree that such an element would be inappropriate in a ROD which, as a legal document, requires a high degree of technical accuracy.
7	"Info": CERCLA/ bias for action, 1st para.	8	Note that CERCLA does not state that treatment is preferable when ever practical. The statutory language of the NCP does state a preference for treatment of the principal threat waste.	Accepted. This information box was deleted. Additional information explaining the intent is provided under the "CERCLA" info in the sidebar on p. 3. The new language is drawn from the Government Institutes' *Environmental Law Handbook*, 15th ed., Section 3.3.5.2, "CERCLA Section 121."

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8	Margin definition: *institutional controls*, 2nd para.	8	Include the phrase "for unrestricted use" in the last sentence after "clean up goals." Note that if cleanup goals are for occupational use, institutional controls restricting site usage would have to remain in place.	Accepted. The sentence was rewritten.
9	*Description and Evaluation of Alternatives*	8	This section should include a short discussion about why the various technologies and treatment trains are necessary, such as ARAR driven treatment and discuss the issue of why stabilization alone is not adequate.	Accepted. Stabilization of some of these materials requires pretreatment. A new sentence will be inserted.
10	Graphic: *Original Selected Remedy*	9	This section should include a brief discussion of what drove the increase in the cost of the remedy chosen in the 1999 ROD.	Accepted. A new diagram will be created showing the original selected remedy as understood in 1997, and how it changed pursuant to the remedial design. The new figure will be inserted with the Original Selected Remedy text. The text will be revised as necessary to support this addition.
11	*Common Elements*, 1st para.	10	The NCP, which regulates implementation of CERCLA discusses the use of institutional controls, not CERCLA itself.	Accepted. The sentence will be rewritten .
12	*Alt. 1(a)–In Situ Vitrification*	11	The discussion of the cost of the alternative must make it clear what the costs addresses. Is this the cost to clean up the entire site or does the cost of the remedy just address the tank contents? This comment applies to the costs associated with all the alternatives discussed in this proposed plan.	Accepted. All the cost sentences in the *Evaluation* statements were rewritten.
13	*Alt. 1(b)–Ex Situ Vitrification*	11	It is not clear why this alternative does not rate as high as in situ vitrification in regards to reduction of toxicity, mobility, and volume through treatment.	Accepted. See response to IDEQ Comment 15.
14	*Alt. 3(a)–In Situ CO/R-S*	17	The discussion of the implementability of the remedy should be expanded to discuss how the residuals in the tank will be addressed (removed with the tanks?). Does this affect the implementability or short-term effectiveness?	Accepted. See response to IDEQ Comment 21.

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15	*Alt. 3(b)–Ex Situ CO/R-S*, 2nd para.	17	EPA disagrees that extracting the liquid waste and bringing it above ground for treatment is less a risk to workers than vitrifying the tanks underground and under a hood. From EPA's perspective workers are better protected if the waste in the tanks remain below ground for treatment rather than to bring it to the surface where shielding is required to protect the workers. This comment also applies to the discussion of the preferred alternative on page 18.	Accepted. The particular subcriteria factoring into this ranking are described in detail in the TER. The short-term effectiveness evaluation was reworded to clarify the balancing of these concerns.
16	*Preferred Alternative,* last para.	19	EPA recommends replacing the word "would" with "will" in this paragraph, for example "...the preferred alternative will be protective..."	No change. The conditional tense is appropriate for an alternative that has not yet been selected and which, as the last sentence states, may be modified. INEEL stakeholders have expressed an aversion to statements that indicate a decision has already been made, when the CERCLA process requires consideration of community acceptance prior to the decision.
17	*Public Involvement*	21	It is EPA's understanding the only one public meeting is scheduled at this time. Also, the calendar for the month of April is wrong, it appears to be for the month of March.	Accepted. The next draft will be updated with the date/location agreed to by the Agencies in early February. The placeholder for the calendar will be completed.
18 [inserted after #4]				