



Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

August 20, 2003

Mr. Wayne Pierre, Team Leader
Environmental Cleanup Office
U.S. Environmental Protection Agency
Region X
1200 ~~Sixth~~ Avenue
Seattle, Washington 98101

Mr. Dean Nygard, Site Remediation Manager
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, Idaho 83706

SUBJECT: Transmittal of the Draft V-Tanks Record of Decision Amendment and Supporting Engineering Design Files for Operable Unit 1-10, Waste Area Group 1, at Test Area North - (EM-ER-03-206)

Dear Mr. Pierre and Mr. Nygard:

The **Record of Decision Amendment for the V-Tanks (TSF-09 and TSF-18) at Test Area North, Operable Unit 7-10**, (DOE/ID-10682 Amendment, Revision C, August 2003 DRAFT) is enclosed for your review. ~~The~~ amendment changes the original V-Tanks remedy to Soil and Tank Removal, Ex Situ Chemical Oxidation/Reduction with Stabilization of Tanks Contents, and Disposal. The tank contents will be removed, ~~treated~~ using either chemical oxidation ~~or~~ reduction, ~~be stabilized~~, and then be disposed of at the INEEL CERCLA Disposal Facility (ICDF) ~~or other~~ approved facility. Finally, as addressed in the original 1999 Record of Decision (ROD), the surrounding soil, tanks, and debris ~~will~~ be removed and disposed of at the ICDF or other approved facility.

The following draft engineering design files are also included for review since they are referenced in and support the V-Tanks ROD Amendment:

EDF-3868, V-Tank Analytical Data - Calculated Averages and Upper Confidence Limits

EDF-3077, Risk-Based Approach for Management of PCB Remediation Waste from V-Tanks

EDF-3948, Use of V-7, V-2, and V-3 for Storing, Blending, and Accumulating Waste During Remediation of the V-Tanks

The cost estimate in Table 8-1 of the ROD Amendment ~~is~~ a compilation of costs from an estimate in the **Conceptual Design Report for Ex Situ Chemical Oxidation/Reduction and Stabilization of the V-Tanks at Waste Area Group 1, Operable Unit 1-10**, (INEEL/EXT-03-00438, June 2003) and from cost estimates prepared during FY 2004 detailed work planning. To support the ROD Amendment a stand-alone ROD Amendment estimate is currently being

prepared. Based on this new estimate, Table 8-1 will be updated and provided for review before the draft final **ROD** Amendment submitted. After the update, Table 8-1 will reflect further scope and estimate development since the comparative estimates were prepared and presented in the **April 2003** V-Tanks **New** Proposed Plan for each of the technologies.

Responses to public and stakeholder comments on the V-Tanks New Proposed Plan are addressed in Part III, Section 13 of the **ROD** Amendment. In addition, IDEQ comments on preliminary draft **ROD** Amendment language are addressed in the attached comment resolution forms. As discussed in the August 14, agency conference call, these comments will be resolved during the **ROD** Amendment review and comment period. -

Per earlier agency discussion, it was agreed that the **ROD** Amendment **should** consider public comments on the V-Tanks Closure Plan that are received by IDEQ. We understand that only one comment was received **by IDEQ**. We also understand that **IDEQ** intends to address the comment as not being relevant to the closure plan since the comment was related to remedy selection and was not a comment received during the V-Tanks Proposed Plan public comment period. Therefore, there are no comments on the V-Tanks Closure Plan that affect the V-Tanks **ROD** Amendment.

The V-Tanks **ROD** Amendment is identified as a primary document in the Federal Facility Agreement and Consent Order (**FFA/CO**). Based on the **FFA/CO** established 45-calendar day review period, comments are requested from the **EPA** and **IDEQ** by October 6, 2003. Please contact me at (208) 526-4392 or Mark Shaw at (208) 526-6442 with any questions.

Sincerely,



Kathleen E. Hain, Lead
Environmental Restoration Program

Enclosures

cc: **C. Cody, DEQ, 1410 N. Hilton, Boise, ID 83706**
M. Wilkening, EPA Region X, Idaho Ops Office, 1435 N. Orchard St., Boise, ID 83706