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# FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (FFA/CO)
# NEW SITE IDENTIFICATION (NSI)

**Part A – NEW SITE IDENTIFICATION INFORMATION**
**(To be completed by the Task Lead for New Site)**

| | | |
|---|---|---|
| 1. | **Site Title:**<br>**TAN-633 Area Soil**<br>(Use known common names, location descriptors and or processes near or associated with the suspected inactive waste site.) | **Site Code:**<br>TSF-53<br>**NSI Evaluation Initiation Date:**<br>July 31, 2006 |
| 2. | **Task Lead For New Site:** Wendell Jolley | Phone: 526-5990 |
| 3. | **NSI Coordinator:** Wendell Jolley | Phone: 526-5990 |
| 4. | **Initiator or Initial Observer:** Dave Eaton/Terry Jorgensen | Phone: 526-7002/526-7137 |

5. **Description of Suspected New Site and Location:**
The suspected new site is located beneath and in the area surrounding the former location of buildings TAN-633, TAN-608, and TAN-649. Demolition of TAN-608 and TAN-649 was completed in October 2005. Demolition of TAN-633 was completed in January 2006. Demolition of these buildings involved removing the building foundations to approximately three feet below ground surface. Radiological contamination was encountered in the soil beneath these buildings. The location and extent of the new site is shown in Attachments 1 and 2.

In addition during the OU 1-10, TSF-09/18 soil remediation excavation in October 2004, an area of wet, saturated soil and pooled water was encountered on the west side of TAN-633. The area being excavated was designated as the Site 2 Waste Line Location (633 T). Samples of the soil and water confirmed Cs-137 and other radionuclides. At the time, because the source of the water and saturated soil appeared to be from beneath TAN-633 (which was not yet demolished), the Agencies agreed to address this contaminated soil under a new site designation. Since TAN-633 has now been demolished and further soil contamination has been identified at its former location, it is appropriate to address all of the soil together as a potential new site.

Finally, it is advantageous to incorporate the soil beneath and surrounding each of the buildings TAN-633, TAN-608, and TAN-649 into OU 1-10 and perform the remediation in accordance with the existing OU 1-10 Record of Decision to allow the remediation to be accomplished in a timely manner.

Contamination levels in the soil beneath the buildings indicate remediation is required. The apparent sources of contamination were also partial contributors to the contamination at the OU 1-10, TSF-09/18 V-Tanks site. Cs-137 was identified as the primary contaminant of concern for OU 1-10 and is also expected to be the primary contaminant of concern for this new site.

TAN-608 and TAN-649 Soil Contamination – The general area surrounding TAN-608 and TAN-649 was surveyed utilizing the Backpack Sodium Iodide System and determined the surface soils to be contaminated above 2.3 pCi/g of Cs-137 but below the remediation goal of 23.3 pCi/g. Other data indicates more significant contamination ranging up to 3,000,000 disintegrations per minute beta/gamma at 3-5 feet below grade near the location of piping beneath the buildings. However due to the small footprint of these buildings and their close proximity to the contamination surrounding the TAN-633 building footprint, the former location of these building are included in this evaluation form.

TAN-633 Soil Contamination – Cs-137 ranging up to 100 pCi/g and other radionuclides were found contaminating the soils surrounding the former location of the TAN-633 building. Soil contamination on the South and East side was identified near the surface while soil contamination on the West side was found at approximately 7 ft deep at the former location of contaminated waste piping leaving the former location of the building. Information from the VCO program indicates that this soil contamination can be expected to continue underneath the footprint of building in the area of the former location of several floor drain lines.

The floor drain piping remains beneath the TAN-633 building. This piping is being addressed by the Voluntary Consent Order (VCO) program. The soil remediation and the piping removal will be performed concurrently. Soil sampling results from areas of identified piping releases will be compared to WAG 1 remediation goals using the CERCLA risk evaluation process as part of the soil remediation process.

This site is recommended for inclusion in the FFA/CO under Operable Unit 1-10, and that the CERCLA soil remediation, and the VCO piping disposition process be performed jointly. An approach for the joint CERCLA soil remediation , and the VCO piping disposition process is discussed in Attachment 3.

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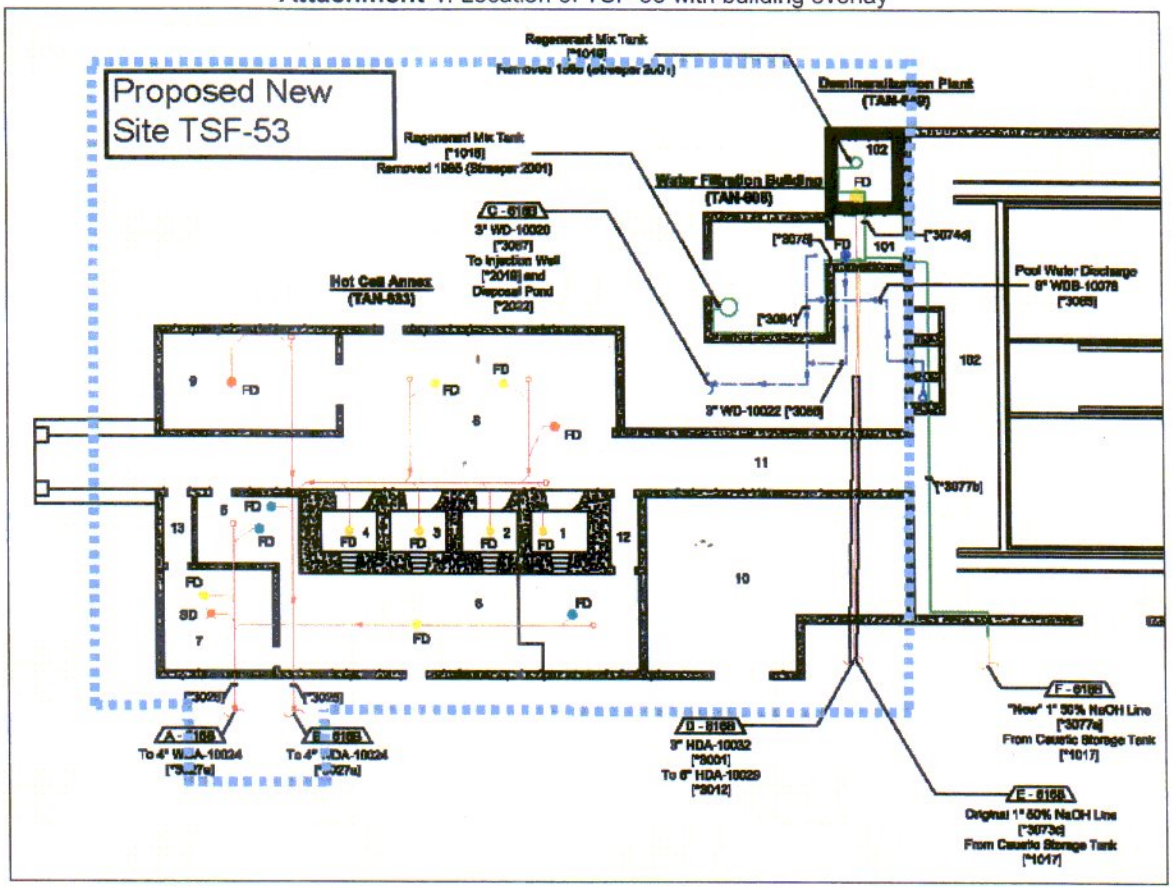
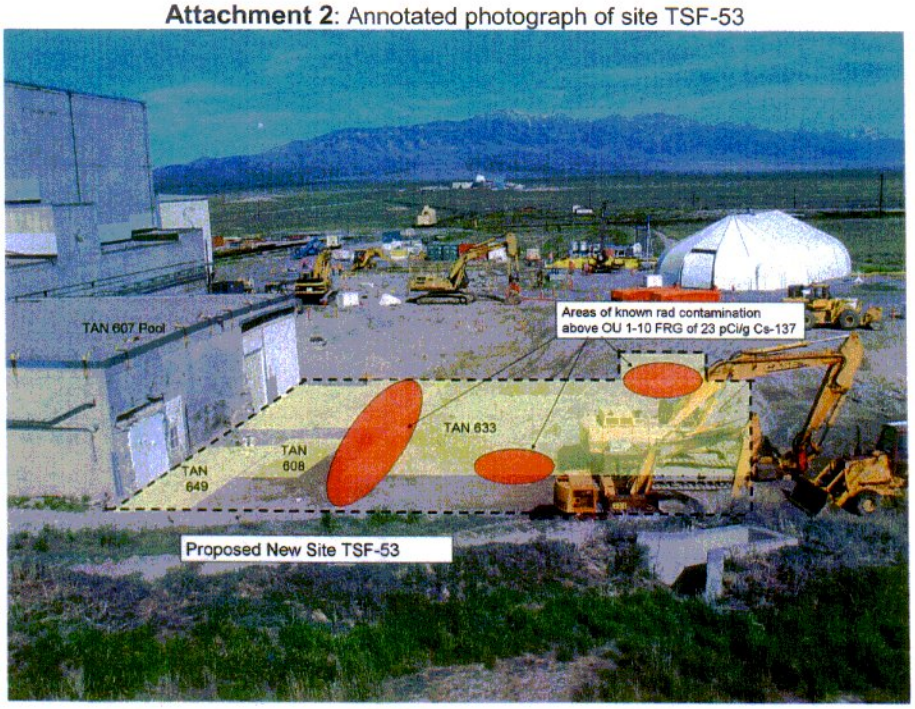
**Attachment 1**: Location of TSF-53 with building overlay




**Attachment 2**: Annotated photograph of site TSF-53



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**Attacment 3**: Joint approach for CERCLA soil remediation, and VCO pipe remova at site TSF-53

- Submit New Site Identification (NSI) form for inclusion of TAN-633 Area Soil under OU 1-10 TAN Remediation – NSI form will note the interface with VCO program for addressing the VCO piping
- Sample soil for waste characterization – Will perform biased sampling at VCO pipe locations
- Excavate soil to depth of VCO piping
- Remove VCO piping and visually inspect for potential release – Areas of identified release will be documented (including location coordinates) [VCO Action]
- Dispose of VCO piping and contents as RCRA waste (per hazardous waste determination documented in the Buried Line Evaluation Report (ICP/EXT-06-01168)) [VCO Action]
- Excavate soil beneath piping to meet CERCLA FRG for Cs-137
- Perform wide area gamma scan to confirm FRG is met – Will remove additional soil as needed
- Perform grab sampling beneath VCO piping release locations (if any are identified) for full suite analysis – Will be performed post soil removal to assess potential remaining contamination [VCO Action]
- Perform sample analysis and validation – Will handoff results to CERCLA [VCO Action]

6. **Is the site a Solid Waste Management Unit (SWMU) as defined in OSWER Directive 9502.00-6?** ☒ **Yes** ☐ **No**

7. **Recommendation**

☐ Recommend not including as a new FFA/CO site. This site DOES NOT warrant further investigation, does not meet the criteria for acceptance, and should not be included under FFA/CO Action Plan.

☒ Recommend including as new FFA/CO site. This site DOES meet the criteria for acceptance, may warrant further investigation, and should be included under FFA/CO Action Plan.

Recommended Waste Area Group (WAG) and Operable Unit to which site should be assigned:

WAG: WAG 1 Operable Unit: OU 1-10

Recommended action for this site:

☐ No Action ☐ No Further Action ☒ Remedial Action under Existing ROD ☐ Track 2 ☐ RI/FS

8. **Responsible Manager Signature:**

Name: Lane Butler Signature: [signature] Date: 8/10/06

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**PART B – FFA/CO RESPONSIBLE PROGRAM MANAGERS (RPM'S) CONCURRENCE**

| **Site Title:** | **Site Code:** |
|---|---|
| TAN-633 Area Soil | TSF-53 |

**DOE-ID FFA/CO RPM Concurrence:** ☒ Concur with recommendation. ☐ Do not concur with the recommendation.

Signature: Yolanda L. Jenson Date: 8-14-2006

Explanation:

I agree that addressing the soil contamination in the areas of the footprints of these buildings under the FFA/CO and consistent with remediation goals for OU 1-10 is the most expeditious and is an appropriate way to address this contamination.

**EPA FFA/CO RPM Concurrence:** ☒ Concur with recommendation. ☐ Do not concur with the recommendation.

Signature: R Matthew Wilkinson Date: 8/21/06

Explanation:

The information provided in this NSI indicates a need for cleanup. Since remediation is ongoing @ OU 1-10, I agree that cleanup of this site should be done under OU 1-10

**State of Idaho FFA/CO RPM Concurrence:** ☒ Concur with recommendation. ☐ Do not concur with the recommendation.

Signature: Daryl F. Koch Date: 8/23/06

Explanation:

Recommend including Site TSF-53 for joint CERCLA and RCRA Voluntary Consent Order (VCO) investigation, soil remediation, and piping removal. I agree the site should be included in the FFA/CO under Operable Unit (OU) 1-10, and the CERCLA soil remediation and the VCO piping investigation and disposition process should be performed jointly. Biased sampling shall be performed at VCO pipe locations and the VCO piping will be removed and visually inspected for evidence of potential releases. Soil shall be excavated that is in excess of the OU 1-10 remediation goal of 23.3 pCi/g and managed appropriately.