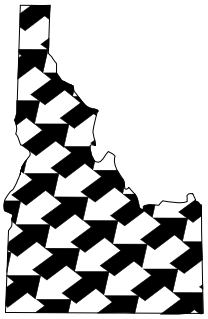

Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory

**Proposed Plan for Operable Unit 4-13A Interim Action, Waste Area Group 4 (WAG 4), Central Facilities Area, Idaho National Engineering and Environmental Laboratory**

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The INEEL CAB reviewed the Proposed Plan for Operable Unit 4-13A Interim Action, Waste Area Group 4 (WAG 4), Central Facilities Area at the Idaho National Engineering and Environmental Laboratory. The document was well formatted and easy to understand. We particularly appreciated the "Consumer Reports"-type tables. We have four recommendations to make on the document.

We understand that the term "interim action" is defined under the Comprehensive Environmental Remediation, Compensation, and Liability Act as any action that will not result in full remediation. We understand that some contamination sources at WAG 4 are not addressed by this Proposed Plan, hence the title of the document refers to it as an "interim action." We sincerely hope, however, that the proposed remedial actions described in the Proposed Plan will constitute final remedies for the contamination sources they are designed to address. The CAB has repeatedly expressed frustration at cleanup efforts that must be repeated, at great cost to taxpayers, because prior efforts were incomplete. **The INEEL CAB recommends that all remedial actions taken at WAG 4 completely and finally address the contamination present to avoid a need for follow-on remediation.**

We understand that the contaminant of concern in the Disposal Pond is mercury. We also understand that analysis (based on the Toxicity Characteristic Leachate Procedure) of sediment from three of the 88 sampling locations in the pond bottom supports a conclusion that the sediment meets the definition for hazardous waste under the Resource Conservation and Recovery Act. We question, however, why phytoremediation was ruled out as an alternative technology that could be less costly than the preferred alternative. In addition, the $9.9 million estimate for operating and monitoring costs under Alternative 4 seems very high. **The INEEL CAB recommends further evaluation of alternative technologies to reduce the costs associated with cleanup on the disposal pond.**

Text describing the preferred alternative for the Sewage Treatment Plant Drainfield states that "in approximately 189 years the risks from the Cesium-137 contamination at the site would decrease to a level below the human health risk threshold." Table 5 states that Cesium-137 has a half-life of 30 years. The table leads us to a conclusion that the Cesium-137 would decay to acceptable levels in 90 years rather than 189 years. A presentation to the CAB explained the concept of a "preliminary remediation goal" which was, unfortunately, not well explained in the Proposed Plan. The document simply does not provide an adequate explanation for why it would take 189 years to achieve acceptable risk based levels. **The INEEL CAB recommends clarification of these apparent discrepancies and/or inadequate explanations**. We cannot

support the selection of Alternative 4 as the preferred alternative without a better understanding of how long it will take the Cesium-137 to decay to acceptable levels.

We appreciated the addition of items for informational purposes throughout the text (marked with an “info” icon), with one exception. The INEEL CAB feels that the text located under the info icon on page 20 raises a flag related to polychlorinated biphenyls (PCBs). There was no obvious need to raise unnecessary public concerns, particularly given the very low level of PCBs detected at WAG 4. **The INEEL CAB recommends against the inclusion of alarmist information that serves no purpose in the document.**