



15-CAB-002

INL Site Environmental Management

C I T I Z E N S A D V I S O R Y B O A R D

May 6, 2015

Chair

Herb Bohrer

Members

Robert Bodell

Keith Branter

Bradley Christensen

Marvin Fielding

Harry Griffith

Kristen Jensen

Trilby McAfee

Betsy McBride

Willie Preacher

Cathy Roemer

Bill Roberts

Liaisons

Jack Zimmerman

DDFO, DOE-ID

Dennis Faulk

U.S. EPA, Region 10

Susan Burke

State of Idaho

Daryl Koch

State of Idaho

Hoss Brown

Idaho Cleanup Project

Support Staff

North Wind Services

1425 Higham Street

Idaho Falls, ID 83402

Phone 208.557.7886

Fax 208.528.8714

Jack Zimmerman

Deputy Manager, Idaho Cleanup Project

U.S. Department of Energy, Idaho Operations Office

1955 N. Fremont Ave., MS 1222

Idaho Falls, ID 83415-1222

Subject: Land Use Standards

Dear Mr. Zimmerman,

In 2014, the Department of Energy Idaho Operations Office (DOE-ID) presented a request to the Idaho Site Environmental Management (EM) Citizens Advisory Board (CAB) to consider making a recommendation on a proposed change to clean-up standards at Idaho National Laboratory. As presented, the current clean-up standards for INL, as agreed to by the U.S. Environmental Protection Agency (EPA) and the State of Idaho, require clean-up to meet unrestricted use standards as defined by the EPA, for most areas of the Site.

This requires clean-up of all contaminants down to a level of 10 feet below the surface of the ground. Industrial standards require clean-up to only a level of 4 feet, because these areas will remain under some set of institutional controls. DOE-ID is currently considering two specific areas within the fenced boundaries of the Advanced Test Reactor area and the Idaho Nuclear Technology and Engineering Center boundaries be considered for clean-up to industrial standards, instead of the residential standards as is required in current agreements with the State and EPA. Further, DOE-ID requested consideration of expanding this change in clean-up standards to all areas within the fenced boundaries of these two installations.

The CAB has seriously considered these requests. We have discussed them in several meetings, and formed a second sub-committee to support further discussion. After additional consideration by our members, we have been unable to reach a consensus on a recommendation regarding either the two specific proposed areas or the total area within the fenced boundaries of these facilities.

On an issue such as this, it should not be surprising that we have been unable to come to a unanimous agreement. By design, the CAB is meant to be a diverse group of citizens, representing a wide range of opinions, experience, and viewpoints. The discussion on this topic has borne this out. Some members believe it is entirely appropriate to take action to change this standard for these areas.

Jack Zimmerman
Page 2

Others view it as a an inappropriate attempt to roll back clean-up standards that were negotiated in good faith with the State, the EPA, and the public, including the CAB at that time.

As specified in the CAB operating procedures, consensus is the preferred method of decision-making. Provisions exist to use a majority-vote process. The CAB chose not to use the voting process, instead electing to report only the inability to reach consensus. The CAB does not intend further deliberation on this issue at this time.

We appreciate the opportunity to have been involved in this effort.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Bohrer', with a long horizontal flourish extending to the right.

Herb Bohrer
INL EM CAB Chair

cc: Dennis Faulk, EPA
Daryl Koch, DEQ
Susan Burke, DEQ
Bob Pence, DOE-ID