



Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory

**PROPOSED STRATEGY FOR REMEDIAL ACTIONS
AT WASTE AREA GROUP 3
IDAHO CHEMICAL PROCESSING PLANT**

INTRODUCTION

The Idaho National Engineering and Environmental Laboratory Citizens Advisory Board (INEEL CAB) requests that the U.S. Environmental Protection Agency National Remedy Review Board consider this recommendation regarding DOE's proposed strategy for remedial actions to achieve cleanup of contamination at Waste Area Group 3, Idaho Chemical Processing Plant (ICPP), at the INEEL.

RECOMMENDATION

The INEEL CAB recommends that the National Remedy Review Board accept the DOE's proposed strategy for cleanup at the ICPP. We considered three issues in achieving consensus on this recommendation as summarized below.

The INEEL CAB feels that the range of alternatives evaluated in the ICPP Remedial Investigation and Feasibility Study covers the feasible actions for cost-effective cleanup. In general, the additional alternatives considered to support the Remedy Review Board's review appear to add significant cost with little reduction in risk to humans or the environment. Specifically, the INEEL CAB does not support using pump-and-treat technologies for the perched water and the Snake River Plain Aquifer alternatives. We believe they involve extremely high costs and a high degree of technical uncertainty with very little benefit.

The INEEL Comprehensive Facility and Land Use Plan (March 1996) defines future land uses at the INEEL. This plan designated the ICPP as an area where the federal government expects to retain control for at least the next 100 years, with the possibility of restricted industrial use during that time. The INEEL CAB's recommendation on this plan, dated November 15, 1995, expressed support for the 100-year scenario at the ICPP. We believe the 100-year scenario is acceptable and appropriate because federal government control of the area will limit the potential for human exposure to contamination.

In addition, the INEEL CAB finds the approach of using risk levels of 1×10^{-4} to determine the need for remedial action to be acceptable. We recognize this approach is less conservative than that used for some Superfund cleanups. We feel, however, that the significantly higher costs that would be imposed by using risk levels between 1×10^{-4} and 1×10^{-6} to trigger remedial action to be unjustified. While the CAB has never articulated acceptance of this approach in a recommendation, we have been aware of it for some time and have accepted it without comment.