



Citizens Advisory Board  
Idaho National Engineering and Environmental Laboratory

**PROPOSED PLAN FOR REMEDIAL ACTION AT THE  
IDAHO CHEMICAL PROCESSING PLANT  
(WASTE AREA GROUP 3)**

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The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) submits the following recommendations on the Proposed Plan for Waste Area Group 3 (WAG 3).

1. **The INEEL CAB recommends that DOE more seriously consider comments submitted by the Board informally and through discussions.**

We appreciated the opportunity to be involved in this document throughout its preparation. The Board, primarily through our High Level Waste Committee, was provided with ample information and with the opportunity to ask questions and make suggestions on the plan at various stages. This experience contrasted with our earlier experience evaluating the first Proposed Plan for Waste Area Group 1 (WAG 1). The WAG 1 experience led us to conclude that early involvement and frequent updates maximizes the Board's opportunity to advise DOE decision making.

We noted with frustration, however, that most of the comments we had previously made on the WAG 3 Proposed Plan were not incorporated in the final version. One example is the fourth comment made by the INEEL CAB's High-Level Waste Committee in a letter dated September 11, 1998. More extensive examples are afforded by reviewing the minutes from the High-Level Waste Committee's July 2, 1998 conference call. (Both the letter and the minutes are attached.) Both sets of suggestions were provided in the spirit of helping DOE improve its communication with the public. The apparent disregard for our input causes us to reconsider the effectiveness of the early involvement.

The High Level Waste Committee spent considerable time reviewing earlier versions of this document. As the Board is composed of volunteers, we prefer to apply our resources to those efforts that have the greatest potential benefit to DOE. We encourage DOE to demonstrate its appreciation for our contributions by incorporating our input or providing an explanation as to why it cannot be incorporated.

2. **The INEEL CAB recommends use of simplified formats and nomenclature in Proposed Plans.**

Proposed Plans are, first and foremost, public documents. We were very much impressed by the simplified format employed in the Proposed Plan for WAG 1. That Proposed Plan is much easier to read and to understand than the WAG 3 Proposed Plan. It is unfortunate that DOE did not employ the same enhanced public communication strategy for WAG 3.

We noted in particular the continuing use of “group” numbers, “operable unit” (OU) numbers, and “CPP” numbers in the Proposed Plan for WAG 3. Thorough reading allowed us to find definitions for each numbering scheme, but the intermingling of the three did not lend itself to effective communication. We would recommend, at a minimum, the addition of graphics or maps to enhance the reader’s ability to understand the three sets of terms. Preferably, either the OU or the CPP numbers should be selected for communication with the public.

3. **The INEEL CAB recommends that DOE-ID embrace Secretary Richardson’s recent suggestion to communicate with “plain language.”**

We noted, for example, that the discussion of average flow rates in the Snake River Plain Aquifer could easily result in a conclusion that the contaminant plume is moving at the same linear rate as the water. Plain language would enhance the public’s ability to more fully understand the issues that challenge the agency.

4. **The INEEL CAB recommends that the Record of Decision include much more detailed information about the ICDF.**

The Proposed Plan lacks detailed information about the ICDF. We recommend that the Record of Decision outline the exact location and size of each of the six cells planned for the ICDF and describe how each will be constructed, used, and closed.

5. **The INEEL CAB believes that the ICDF will be acceptable if it is designed to meet several conditions. The Record of Decision should commit the Department to designing the ICDF in accordance with these conditions:**

- **The INEEL CAB recommends that the ICDF be designed to avoid the effects of the probable maximum flood.** The contaminants that would be disposed at the ICDF have radionuclides with very long half lives. Design to avoid the impacts of a 100-year flood may not offer sufficient protection.
- **The INEEL CAB recommends that the ICDF final design be fully compliant with the Resource Conservation and Recovery Act (RCRA) substantive requirements.** DOE may need to dispose of waste containing RCRA-listed contaminants at the ICDF. The design should accommodate that possibility to avoid expensive retrofitting in the future.
- **The INEEL CAB recommends that the ICDF be constructed, filled, and closed using the phased approach referred to in presentations to the Board.** We would like to see the ICDF to be as small and manageable as possible, yet noted no description of the phased approach in the Proposed Plan. We recommend that the Record of Decision include detailed information about how the phased approach will be implemented.

- **The INEEL CAB recommends that use of clean areas to dispose of wastes be minimized to the extent possible.** The Board has stated in the past its support for using already contaminated areas as disposal sites for low-level waste. Use of clean areas is much less desirable.
  - **The INEEL CAB recommends that the ICDF waste acceptance criteria be sufficiently restrictive to protect the aquifer.** The criteria should be constructed using a long-term point of view with an appropriately designed public involvement process. INEEL waste generated by the cleanup program that does not meet the criteria should be disposed of off-site.
6. **The INEEL CAB recommends that DOE conduct further study of methods for replacing the percolation ponds and that the Record of Decision provide much more detailed information on this issue.**

Under the preferred alternative for contaminated perched water under WAG 3, the existing percolation ponds would be removed from service and replaced with “like for like” replacement ponds or surface water discharge to the Big Lost River. The INEEL CAB recommends that DOE conduct additional feasibility studies before determining how to proceed with replacement.

In order to fairly assess the feasibility of replacements, we also recommend that DOE more fully characterize the wastewater that currently goes into the percolation ponds and develop estimates of volumes and chemical composition for wastewater that will need to be managed once the existing ponds are taken out of service. We recommend that recycling of water be maximized and encourage DOE to consider treatment of residual wastewater to reduce risks. We do not want to see future surface water discharges contribute to further contamination of the INEEL soils or groundwater either inside or outside the “zone influencing perched water contaminant transport.”

7. **The INEEL CAB recommends that DOE move quickly in making its final risk management decision for the Tank Farm Soils.**

The Proposed Plan states that a final risk management decision is anticipated for the Tank Farm Soils in 2004. We wonder why it will take that long to make that decision and recommend DOE move quickly to safely manage the risks posed by the Tank Farm Soils.

8. **The INEEL CAB recommends that the DOE continue efforts to find viable and effective remediation alternatives before implementing “pump and treat” strategies for the aquifer contamination.**

The Board understands that extraction of groundwater (from the zone of influence in the Snake River Plain Aquifer) will take place only if contaminant levels are found to exceed trigger levels. Because we doubt that the “pump and treat” approach can be effective under the circumstances that exist at WAG 3, we encourage DOE to continue its efforts to identify other viable alternatives. The costs associated with pump and treat strategies jeopardize other valuable

programs. We are hopeful that ongoing research endeavors will identify alternatives before DOE would have to take action to remediate the Snake River Plain Aquifer.