



Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory

Proposed Plan for Operable Unit 10-04: Waste Area Groups 6 and 10

The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) has reviewed the Proposed Plan for Operable Unit 10-04: Waste Area Group (WAG)'s 6 and 10. The document, prepared by the the Department of Energy's Idaho Operations Office (DOE-ID) in coordination with its regulators, the State of Idaho and Region X of the U.S. Environmental Protection Agency, is formatted nicely, user-friendly, and easy to understand.

The CAB's overall impression of the Proposed Plan for WAGs 6 and 10 is perhaps driven by the recent release of the Top-to-Bottom Review and its criticism of DOE-ID for doing too little in recent years to reduce risks to human health, safety, and the environment for major projects. We question why DOE is eager to move forward with remediation for WAGs 6 and 10, because they do not pose the most urgent risks at the INEEL.

In addition, we had understood that WAG 10 was established to address contamination that does not fall within the boundaries of any other WAG, residual contamination that remains after completion of any single remedial action, and the Snake River Plain Aquifer. We also understand that the Proposed Plan for Operable Unit 10-08 will address groundwater and site-wide institutional controls.

Our review of the risks associated with the two WAGs leads us to conclude that a delayed cleanup decision at WAGs 6 and 10 would be acceptable if it allowed cleanup funding to be spent to reduce more urgent risks. **The INEEL CAB recommends that DOE-ID, the State of Idaho, and the Environmental Protection Agency consider changes in the schedule for remediation of WAGs 6 and 10 until Records of Decision for all other WAGs have been signed and more urgent risks have been fully addressed.**

When DOE decides to move forward with cleanup in WAGs 6 and 10, we suggest consideration of the following comments.

The explanation of risks associated with the TNT/RDX Contamination Sites does not address any risks that would be posed by a possible explosion. When the INEEL CAB inquired about the to risk of an explosion, we were told that the unexploded ordnance sites had not been characterized well enough to estimate the risk of an explosion, and that there are too many uncertainties in the data that is currently available to estimate the probability of an explosion or the possible effects of a detonation. We cannot imagine moving ahead without a better understanding of this issue. **The INEEL CAB recommends that DOE-ID conduct additional characterization to describe 1) the potential for an explosion, 2) measures that would be**

taken to protect worker and public safety, and 3) the health effects and environmental impacts in the event of an explosion, before moving forward with a decision.

In addition, the description of the remedial alternatives for the TNT/RDX Contamination Sites states that the explosive materials at the TNT/RDX sites would be removed by hand. Based on responses the INEEL CAB received to our questions, we now know that the phrase “removed by hand” means that typical excavation machinery would not be used. What measures would be taken to protect the workers involved in this excavation from exposure to the contamination and from a possible unintended detonation?

Some of the cost estimates are unclear. For example, it is unclear in the Proposed Plan why the costs of Alternative 3 would be much higher than for Alternative 2 for ordnance areas. DOE-ID was able to provide more detailed explanations upon questioning. **The INEEL CAB recommends that the Record of Decision be based on solid cost estimates.**

We question why Alternative 3a “on-site disposal” would be preferred over Alternative 3b “off-site disposal” for the excavation material from the TNT/RDX Contamination Areas. If the costs of the two alternatives are basically the same (given the error factors associated with cost estimates), it makes no sense to prefer on-site (over a sole source aquifer and requiring continuing monitoring) to off-site disposal. The minimal additional cost appears justified. **The INEEL CAB recommends that DOE-ID and its regulators select Alternative 3b instead of Alternative 3a, as it is more protective of the aquifer.**

We wonder how long institutional controls will be needed at those sites that require no remediation. Table 9 lists sites requiring institutional controls and 5-year reviews, but no remediation. **The INEEL CAB recommends that the Record of Decision include predicted timeframes for when the risks associated with these sites would diminish sufficiently to allow removal of institutional controls.**

The INEEL CAB is curious why DOE concluded that excavation is needed in the gun range? The risks associated with the gun range do not appear to pose sufficient concern as to justify the cost of excavation. Why would the entire berm need to be removed, as the debris is likely only in half of the berm? We are mindful of the costs associated with construction, operation, maintenance, and surveillance of the INEEL Comprehensive Environmental Response, Compensation, and Liability Act Disposal Facility. Additional site characterization might prove that excavation of the back half of the berms is not necessary. **The INEEL CAB recommends that the Record of Decision clearly explain why such a costly remediation would be necessary if DOE decides to move forward with this approach.**