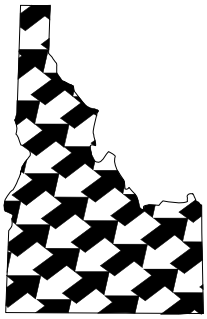

Citizens Advisory Board
Idaho National Engineering Laboratory

WASTE AREA GROUP 3
REMEDIAL INVESTIGATION/FEASIBILITY STUDY

INTRODUCTION

The Citizens Advisory Board to the Idaho National Engineering and Environmental Laboratory has met with Department of Energy personnel numerous times during the past eighteen months to discuss the ongoing Remedial investigation at Waste Area Group (WAG) 3 at the INEEL. During the November 18-19, 1996, and January 21-22, 1997, meetings the Board received updates on the Feasibility Study efforts. After consideration of the presentations and analysis of the documentation submitted for Board review, the CAB offers the following recommendations.

The Board commends DOE's efforts to involve the Board early in the process and appreciates the consistent updates and new information it has routinely received. The portions of the draft DOEID WAG 3 *Feasibility Study* given to the Board for review were concise and reader-friendly and the Board is pleased with these sections.

RECOMMENDATION

The Board recommends that some remedial action be instigated and completed at WAG 3 to prevent health risks to workers and potential future occupants. The Board is concerned with the contamination of surface and subsurface soils, surface water, perched water and the aquifer as a result of activities at WAG3.

The Board recommends DOE-ID correct the following inadequacies as the final Feasibility Study is prepared:

- In future iterations, clarify what the "no action" alternatives include. The "no action" alternatives provided by DOE-ID are not true "no action" alternatives. They assume existing conditions at WAG 3 making them "status quo" alternatives.
- Ex-situ treatment of perched water is included in the groundwater waste unit table summarizing the "technologies retained following preliminary screening," but it is excluded in the table outlining the "technologies retained for consideration as component of remedial alternatives for groundwater." However, it appears that some ex-situ treatment is being considered as part of the interim remedies to be evaluated. The Board recommends DOE-ID include an ex-situ treatment alternative for perched groundwater in further analysis of potential remedial alternatives.
- In-situ treatment technologies have been excluded in the document as "not applicable" due in part to "depth to water and inability to confirm effectiveness." The Board is aware of ongoing research being conducted to determine and demonstrate the benefit of in-situ treatments over other technologies. The Board recommends in-situ treatment technologies be included as potential options in further DOE-ID remediation alternative analyses.
- In Section 4, on page 7, the document states that "contaminant transport modeling suggests that plutonium in the Tank Farm soils will be leached and transported to the SRPA [Snake River Plain

Aquifer] groundwater beneath the site at a future time. As such plutonium is a future SRPA COC [contaminant of concern]." The document does not provide much more information on this issue and the Board recommends additional discussion on the potential for plutonium to be a contaminant of concern in the aquifer.

Finally, the Board recommends that DOE-ID continue to involve the Board in the WAG 3 remedial investigation.