

ARDC



**Department of Energy**  
Idaho Operations Office  
850 Energy Drive  
Idaho Falls, Idaho 83401-1563

April 29, 1998

Mr. Charles M. Rice, Chair  
Citizens Advisory Board, INEEL  
c/o Jason Associates Corp.  
477 Shoup Avenue Suite 107  
Idaho Falls, Idaho 83402

**SUBJECT: Response to Recommendation on the Proposed Soils Repository at the Idaho National Engineering and Environmental Laboratory - (OPE-ER-73-98)**

Dear Mr. Rice:

We appreciate the recommendation received from the Idaho National Engineering and Environmental Laboratory (INEEL) Citizen Advisory Board (CAB) concerning the proposed Soil Repository at the INEEL. Part of the preferred alternative for dealing with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) contaminated soils and debris at Waste Area Group (WAG) 3 (Idaho Chemical Processing Plant) is the construction and operation of an engineered soils repository. In addition, the soil repository would be constructed to allow for the disposal of other INEEL CERCLA soils and debris.

In addition to the recommendation to construct a soil repository, the INEEL CAB had several recommendations related to the design and construction of the soils repository. The Department of Energy Idaho (DOE-ID) Operation Office is addressing these additional recommendations as discussed below.

The response to the INEEL CAB recommendations concerning the selection of the soil repository site are:

- The soils repository is intended to be constructed in an already contaminated area. This will reduce the additional environmental impact caused by the construction of a soils repository.
- The soils repository is intended to be constructed outside of the 100-year Big Lost River flood plain to limit the flooding potential. In addition, the soils repository would be constructed to limit the infiltration of precipitation even during high precipitation events.

- In order to address the two criteria above, it is unlikely that the soils repository would be constructed in the best possible location with respect to the soil profile and geological features. However, the soils repository would be constructed to minimize the migration of contaminants out of the soil repository.
- The soils repository would initially be constructed with capacity for the current estimated volume of contaminated soils and debris including soils and debris from Naval Reactors Facility (NRF) and Argonne National Laboratory West (ANL-W). The soils repository would be constructed to allow for future expansion if necessary.

The design of the soils repository has not been completed. Currently, the design of the soils repository is at the conceptual stage, which is necessary for feasibility study (FS) evaluation, preliminary cost estimating, and selection of a preferred remedial alternative. As the soils repository will be designed following selection of the remedial alternatives in the Record of Decision (ROD), we will inform the INEEL CAB of various design considerations (configuration, liner, engineered cover, etc.) for the soils repository during design.

A waste acceptance criteria for the soils repository has not been completed. The waste acceptance criteria will limit disposal of contaminants that would present an unacceptable risk to the Snake River Plain Aquifer (SRPA), but the design of the repository should anticipate orphan waste streams. Waste acceptance criteria will be defined during the design of the soils repository. However, the soils repository waste acceptance criteria will be in compliance with the Applicable or Relevant and Appropriate Requirements (ARARs) and be protective of human health and the environment, including the SRPA.

The intent of constructing a centralized INEEL soils repository would be to reduce the number of soil repositories at the INEEL. If additional capacity is needed in the future, the INEEL soils repository could be expanded.

We look forward to working with INEEL CAB in the future on the WAG 3 Comprehensive Remedial Investigation/Feasibility Study (RI/FS) project. If you have any questions, please call Talley Jenkins at (208) 526-4978 or myself at (208) 526-4392.

Sincerely,



Kathleen E. Hain, Manager  
Environmental Restoration Program

Enclosure

cc: J. Owendoff, DOE-HQ, EM-1  
M. Crosland, DOE-HQ, EM-22  
K. Hazard, DOE-HQ, EM-22  
R.D. Maynard, INEEL CAB, Environmental Restoration Committee, Chair,  
K. Trever, State of Idaho INEEL Oversight  
C. Clarke, EPA, 1200 Sixth Avenue, Seattle, WA 98101  
W. Pierre, EPA, 1200 Sixth Avenue, Seattle, WA 98101  
D. Nygard, IDHW, DEQ, Community Programs, 1410 N. Hilton, Boise, Idaho 83706  
W. Lowe, Jason Associates Corp., 477 Shoup Avenue Suite 107, Idaho Falls, ID 83402  
K. Rose, EPA, 1200 Sixth Avenue, Seattle, WA 98101  
S. Reno, IDHW, 900 N. Skyline, Idaho Falls, ID 83402  
T. Kluk, DOE-HQ, EM-441  
R. Cummings, DOE-HQ, EM-441