



## Department of Energy

Idaho Operations Office  
1955 Fremont Avenue  
Idaho Falls, ID 83415

July 13, 2005

Mr. David Kipping, Chair  
INEEL Citizens Advisory Board  
c/o Peggy Hinman  
North Wind, Incorporated  
1425 Higham Street  
Idaho Falls, Idaho 83402

**SUBJECT: Response to Citizens Advisory Board Recommendation #121 on the Overall Approach to Cleanup and Closure of the Subsurface Disposal Area (WDP-RWMC-05-037)**

Dear Mr. Kipping:

Thank you for the Citizens Advisory Board Recommendation # 121 on the Overall Approach to Cleanup and Closure of the Subsurface Disposal Area. We are committed to remediating these wastes and to do so in an effective manner that continues to protect human health and the environment. The attachment provides an itemized response to your recommendations.

If you have any questions, please contact me at (208) 526-7300 or Jeff Perry of my staff at (208) 526-4570.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard B. Provencher".

Richard B. Provencher, Assistant Manager  
Idaho Cleanup Project

Enclosure

**Responses to Citizens Advisory Board Recommendation #121**  
**Overall Approach to Cleanup and Closure of the Subsurface Disposal Area**

1. *If the historical records (including the location of marker shipments as related to survey monuments) prove to be unreliable, the INEEL CAB recommends that further excavation be based on alternative analysis techniques, such as geotechnical surveys.*

If historical records prove to be unreliable for the purpose of locating retrieval areas or supporting remediation decisions, DOE will consider the use of alternative techniques. That said, at this time DOE believes that sufficient information is available to support risk management decisions. As noted in the response to Recommendation # 119, remarkably good records are available to reconstruct disposal history for the Subsurface Disposal Area. Not only are there shipping records, there is also substantial information about waste-generating processes and waste characteristics. The historical information provides a good foundation for collecting additional scientific data through probing, geophysics, and soil gas surveys if needed to support remediation decisions. As demonstrated by the comparability of the waste retrieved in the GEM Project to corresponding records and scientific data, DOE is able to effectively identify disposal locations with high densities of waste containing contaminants of concern quite adequately for purposes of remediation.

Geophysical surveys including electromagnetic (EM) surveys and vertical gradient magnetic (VGM) surveys, have already been conducted on the Subsurface Disposal Area (SDA) with limited success. A briefing for the CAB can be arranged to discuss the details of the geophysical surveys and the application of the survey results to the WAG 7 program.

2. *The INEEL CAB recommends that DOE, using the best available information, expand the scope of excavation to allow simultaneous activity at multiple sites throughout the SDA. If presented with funding constraints to either simultaneous activity at multiple sites or removal of the entire SDA, the INEEL CAB recommends that DOE focus its efforts on those areas that contain waste identified as presenting the highest risk.*

DOE is currently evaluating the feasibility of accelerating the retrieval schedule by retrieving waste from multiple areas at one time. DOE expects to complete this evaluation late summer/early fall, 2005.

If constrained by funding, DOE agrees with the recommendation that selection of a final remedy should be based on a rigorous risk assessment as required under CERCLA, as noted in the response to Recommendation # 119.

3. *The INEEL CAB recommends that DOE continue to characterize all waste that is removed. The INEEL CAB recommends that DOE segregate and retain for further analysis any excavated waste that does not meet the current waste acceptance criteria of the potential disposal facility rather than putting it back into the pit.*

DOE will continue to characterize all waste that is removed from the SDA, and in fact must do so in order to determine the appropriate and regulatory compliant safe handling, packaging and disposition. DOE will continue to dispose of all waste that is packaged through the Drum Packaging Stations and removed from the Retrieval Enclosure off of the SDA.

4. *The INEEL CAB recommends that any excess capacity at the CCP (beyond what is required to meet the Idaho Settlement Agreement milestone) be used to characterize the excavated material.*

Use of the CCP will be optimized to support meeting our commitments. DOE intends to use any excess CCP capacity beyond what is required to meet the Idaho Settlement Agreement milestone to support other cleanup work.