



*Many Voices Working for the Community*

# Oak Ridge Site Specific Advisory Board

---

July 8, 1999

Mr. Rod Nelson  
U.S. DOE/ORO  
P.O. Box 2001, EM 90  
Oak Ridge, TN 37831

**RE: Comments on Proposed Plan for Melton Valley Watershed (DOE/OR/01-1724&D3)**

Dear Mr. Nelson:

The Oak Ridge Site Specific Advisory Board (ORSSAB) approved the enclosed comments on the *Proposed Plan for Melton Valley Watershed (DOE/OR/01-1724&D3)* at our July 7, 1999 Board meeting.

We look forward to your written response to our comments.

Sincerely,

A handwritten signature in cursive script that reads "William M. Pardue".

William M. Pardue, Chair

WMP/sb

Enclosure

cc: Marianne Heiskell, DOE/ORO  
Earl Leming, TDEC  
Jon Johnston, EPA Region 4



## Oak Ridge Site Specific Advisory Board

### Comments on the Proposed Plan for the Melton Valley Watershed (DOE/OR/01-1724&D3)

The Oak Ridge Site Specific Advisory Board has had many opportunities to discuss the development of this well-written Proposed Plan (PP). The Board considers the Preferred Alternative to be a generally viable plan to move toward appropriate remedial action objectives. Removing all contamination sources would involve too much worker and ecological risk even if the cost were not estimated to be prohibitive. The less ambitious alternatives considered in the Feasibility Study would not deal adequately with some of the primary (e.g. the "trenches") and secondary contamination (e.g. the intermediate holding pond) sources. The Preferred Alternative does represent a reasoned "middle ground."

The Board reluctantly agrees that it is wise to delay a "final" decision on some matters such as residual surface contamination, though usually the Board supports comprehensive planning so that "surprises" may be avoided. The persuasive arguments for delay are (1) that the decision tends to guarantee a full evaluation of these problems when the source removal and hydraulic isolation actions are complete, and (2) it really is impossible to predict now the exact risk-management status of the valley after the planned actions. It is predictable that the combinations of contaminant removal and stabilization along with water control actions that comprise the Preferred Alternative have been judiciously chosen and will greatly reduce risks on and off of the site.

The Board does have some concerns that are detailed below, but these do not challenge the wisdom of the principal remediation choices. The following topics should be fully addressed in the upcoming Record of Decision (ROD):

- The interim hazard levels chosen to trigger removal of contaminated soil may be so high as to require expensive attention to control the size of post-remediation worker risks. The need for such attention could be reduced by removal of near-surface contamination from a few more acres. The Proposed Plan appears to assume an unrealistically low number of exposure hours per worker per year.
- The Preferred Alternative proposes to use some contaminated soils as "contour fill" under caps over burial grounds that will remain in place. It is reasoned that these soils are far less contaminated than the waste that resides beneath the present ground surface. The Board cautions that for small savings in cost and risk to workers this practice would increase the losses from the occasional cap failures that eventually will occur.

In addition, since the contaminated soil is "in hand," this waste disposal practice would amount to adding new waste to a burial ground known not to

be protective. The Board suggests that any, such "new" waste beneath the planned caps be considered just like the contents of newly constructed waste disposal facilities. If the waste acceptance criteria (WAC) for a facility so constructed would allow acceptance of the contaminated soils being considered, the practice would be agreeable to our Board. A general protocol could be devised to make such decisions practicable at construction time when a surface soil sector is being considered for removal.

- Because the waters of Melton Valley must eventually attain standards for recreational use, the PP often refers to recreational standards for the area being met after a time. Elsewhere the PP suggests that public use will be restricted. The Board finds these statements confusing, and asks that the ROD very carefully define its usage of the word "recreational." Everybody interested should be able to understand what this important ROD means.
- The ROD must express a definite commitment to seek funding for maintenance and other stewardship work needed to attain compliance with the remedial action objectives. The Board is also concerned that the coverage in the PP of just what actions stewardship will require would not be adequate for the ROD. We expect that the Stewardship Working Group will comment on these needs.
- The ROD should increase the attention given to the radiation levels expected from longer-lived radionuclides a few hundred years hence, at least by reference. At that time the levels of buried strontium-90, cesium-137, and especially tritium will be very much reduced.
- Page 13 of the PP suggests that waste from grout sheets can possibly migrate to shallow groundwater. After wells are plugged, the words overstate the likelihood of serious migration. We understand that the sparse groundwater near the grout sheets is saline. The shallow groundwater is not saline. Some of the wells may be contaminated, but the threat of that spreading widely seems less ominous.

The Board looks forward to the early approval of the Record of Decision for this watershed. The remediation of Melton Valley is particularly important to us, and we understand that the job will be long and demanding. Completing the job requires approval of the Record of Decision as well as all the required remediation work.