



*Many Voices Working for the Community*

# Oak Ridge Site Specific Advisory Board

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June 8, 2000  
Mr. Rod Nelson  
Assistant Manager for Environmental Management  
DOE-ORO  
P.O. Box 2001, EM-90  
Oak Ridge, TN 37831

Dear Mr. Nelson:

***Recommendations and Comments on the FY 2000 Remediation Effectiveness Report for the U.S. Department of Energy Oak Ridge Reservation, Oak Ridge, Tennessee, DOE/OR/01-1858&D1***

At our June 7, 2000, Board meeting, the Oak Ridge Site Specific Advisory Board reviewed and approved the enclosed recommendations and comments on the subject document.

The Board commends DOE on its preparation of the document. It provides stakeholders with a useful summary of current Comprehensive Environmental Response, Compensation, and Liability Act actions on the Oak Ridge Reservation. Furthermore, it embraces the concept of watershed management for the reservation, which Oak Ridge stakeholders view as the most effective and efficient way to understand and remediate the contaminated areas.

We appreciate the opportunity to comment on the document and look forward to receiving your written response to our recommendations and comments.

Sincerely,

A handwritten signature in black ink that reads "Steven H. Kopp".

Steven H. Kopp, Chair

Enclosure

SHK/plo

cc: Dave Adler, DOE-ORO  
Jason Darby, DOE-ORO  
Susan Gawarecki, LOC  
John Hankinson, EPA  
Earl Leming, TDEC  
Julie Pfeffer, Bechtel Jacobs Company  
Ralph Skinner, DOE-ORO



**Oak Ridge Site Specific Advisory Board  
Recommendations and Comments  
on the 2000 Remediation Effectiveness Report  
for the U.S. Department of Energy, Oak Ridge Reservation,  
Oak Ridge, Tennessee, DOE/OR/01-1858&D1**

**GENERAL RECOMMENDATIONS**

The Oak Ridge Site Specific Advisory Board recommends that the Department of Energy Oak Ridge Operations:

- Take whatever steps are necessary to declare that all Remediation Effectiveness Reports (RERs) are part of the Administrative Record.
- Include stewardship requirements in Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Records of Decisions (RODs) and Action Memoranda.

To protect the health and safety of future generations, stewardship requirements for remediated/contaminated areas on the Oak Ridge Reservation (ORR) must be described in statutory decision documents (i.e., CERCLA RODs or Action Memoranda). It is unacceptable to relegate stewardship requirements to documents prepared after the decision documents (e.g., Remedial Action Reports or Removal Action Reports; see paragraph 2 on pages xv and 1-1). Such documents are not required to be part of the Administrative Record; thus, the details and requirements for stewardship may be lost to future generations. Furthermore, post-decision documents lack standing in court, and given Congress' growing disinterest in providing funds for remediation and management of DOE's contaminated lands, we believe it is important for future generations to have recourse to the courts through statutory decision documents.

- Include an up front chapter devoted to any deletions or adjustments to required monitoring and other stewardship requirements (e.g., physical and institutional controls).
- Include in an appendix a list of all remaining CERCLA remedial actions required for the ORR. Anticipated completion dates should be given.

It is assumed that the Oak Ridge Federal Facility Agreement will remain in effect throughout all cleanup operations, but if this is not so, actions required by other environmental laws should be entered in the list.

- Establish a well-publicized annual public meeting for the draft RER to summarize remediation progress and provide for stakeholder input to the Environmental Management Program.

It is important that DOE initiate an annual "State of the Reservation" meeting now so that it becomes an established event that provides current and future stakeholders with an understanding of remediation progress, problems, and planning.

- Improve the recommendation sections of the individual actions and the “Recommendations Summary” in Chapter 8.

These sections typically lack substance and could be improved by inclusion of CERCLA decision logic. For example, detailed analyses of some contamination sources have led to decisions that it is either technically not feasible to remediate completely or too costly, but no reference or discussion is provided. In other cases, there are sources for which considerable cleanup is planned for the future, but these actions are loosely described or not described at all.

- Address (quantify) under the sections on recommendations or evaluations:
  1. The risk to human health and the environment
  2. Acceptance levels

### **SPECIFIC COMMENTS ON REPORT CONTENTS**

- The entries “Not established” under the column “Monitoring/Stewardship Requirements” should include a statement on when or how they will be established (Table 1.1)
- Item 2.10.2, “Recommendations,” should include a radon measurement program.
- Paragraph 1.2 notes that 52 CERCLA actions are mapped in Figure 1.1, but only 46 are identified on the figure.
- The Oil Landfarm and the Boneyard/Burnyard are identified in Figure 5.1 as “CERCLA Actions in Progress” activities, but there is no writeup in Section 5. There is an entry under Section 8.4, “Recommendation Summary for Boneyard/Burnyard,” which hangs by itself. Note that other “CERCLA Actions in Progress” (e.g., 2.10, 2.11, 3.7, 3.8) are written up.
- The letter entries under “Criteria Exceeded” in Table 7.2 need to be explained.
- Stewardship functions should be described, or it should be made clear when they will be included and what organizations will be responsible (Table 1.1)
- Reference to a CERCLA 5-year review plan is inadequate to explain further stakeholder involvement. The need for involvement and long-term funding of stewardship activities should be explained. (Section 1.1)
- Identify target conditions for each action and medium (soils, groundwater, surface water, air) in the sections entitled “Evaluation of Decision Document Requirements for Performance.”
- Identify contingency plans for each action if target conditions are not met (under the paragraphs entitled “Document Requirements for Performance”).
- Discuss the actions to be taken at the end of remedial design life. It appears that remedial actions are considered to be permanent solutions (“Recommendations” under each action).
- Describe the requirements and scheduling for inspection of physical systems (the columns identified “Reference for Monitoring Requirements” in Table 1.1).

- Describe the future points at which decisions would be required to assess the effectiveness of each remedy or need (under “Evaluation of Performance Monitoring Dates”).
- Describe barriers, signs, and postings, where applicable, for sites with physical controls (“Project Descriptions”).
- Describe when easements or buffer zones are required (“Project Descriptions”).
- Identify contaminated property which might be released. Address the need for deed notices or restrictions (“Project Descriptions”).
- Include in Figure 3.8 the sources which have been remediated, those that will be remediated later, and those that will not be remediated at all. (Section 3.8, Gunitite and Associated Tanks).
- On page 4-24 it is stated that the Sr<sup>90</sup> levels at the WAG 4 MSI site have not decreased as expected under high flow conditions since grouting of upstream trenches, etc., was completed. Therefore, it does not appear that remediation has taken place. The “Recommendations” section on this page is especially weak. It only says that more samples should be taken during Fiscal Year 2000. Is there an action plan fixing the sources for this area? (Section 4.5, WAG 4 Seeps Removal).
- The sections on the Molten Salt Reactor are pretty brief and do not describe a final remediation plan. Is there a plan to dismantle, encapsulate, and bury the remnants of this project? If not, what are the extenuating impediments? (Sections 4.7, 4.8, and 4.9, Molten Salt Reactor).
- The mercury and total uranium fluxes at Station 17 in Upper East Fork of Poplar Creek have really not declined substantially since 1995 in spite of the efforts being conducted with known Y-12 sources. However, the last paragraph on page 6-6 states that the mercury concentrations have decreased 50 percent in the past 5 years and that the uranium values for grab samples have also “generally declined”. The graphs (Figure 6.3) do not show this convincingly. An explanation is called for. (Y-12 and the Adjacent Areas, pages 6-6 to 6-8).
- There is an unexpected detection of Sr<sup>90</sup> from well GW-205, which is downstream from the United Nuclear Corporation (UNC) disposal site. No plans are stated for determining the source, and the final two sentences in Section 6.2.3 are unacceptable. These sentences basically state that the source of Sr<sup>90</sup> is unknown and cannot be determined, but it cannot be from the UNC site. A much more detailed explanation of what is to be done to find and eliminate this source is in order. (Section 6.2, UNC Disposal Site).
- DOE should develop a plan to find and eliminate the sources of mercury and selenium in McCoy Branch. (Section 6.7, Filled Coal Ash Pond/McCoy Branch, page 2-26).
- Explain under “Recommendations” why the plume could not be studied further to determine how to stop the sources of the volatile organic compounds. (Section 6.9, page 6-34).